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*(Additional Attorneys for Plaintiff on next page)*

**IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JOHN BURNELL, JACK POLLOCK,  
and all others similarly situated,

Plaintiffs,

v.

SWIFT TRANSPORTATION CO.  
OF ARIZONA, LLC,

Defendant.

**CASE NO. 5:10-CV-00809-VAP (OPx)**  
(Related to Case No. EDCV 12-00692-VAP-OPx)  
(Assigned to Hon. Virginia A. Phillips)

**DECLARATION OF STANLEY D. SALTZMAN IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND CERTIFICATION OF SETTLEMENT CLASS AND (B) PLAINTIFF'S MOTION FOR AN AWARD OF (1) ATTORNEY'S FEES TO CLASS COUNSEL, AND (2) ENHANCEMENT TO PLAINTIFF**

Complaint Filed: March 22, 2010  
Trial Date: None Set

**Additional Attorneys for Plaintiffs:**

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**DECLARATION OF STANLEY D. SALTZMAN**

I, Stanley D. Saltzman, declare as follows:

1. I am an attorney licensed to practice in all Courts in the State of California. I am a partner with the firm of Marlin & Saltzman LLP, and Co-Class Counsel for the settlement class in the above-captioned action. This Declaration is submitted in support of (A) Plaintiff's Motion for Final Approval of Class Action Settlement and Certification of Settlement Class and (B) Plaintiff's Motion for an Award of (1) Attorney's Fees to Class Counsel, and (2) Enhancement to Plaintiff. Unless otherwise indicated, I have personal knowledge of the facts set forth herein and could competently testify to them if called as a witness.

2. I graduated initially from the University of Montreal School of Law in 1977 (a totally French-language law school) and then from the Southwestern University School of Law here in Los Angeles, in 1979, at which time I was admitted to the California Bar. I have been practicing litigation for more than thirty-nine years, and co-founded the firm of Marlin & Saltzman back in 1985. Throughout my practice, I have specialized in a variety of complex multi-party cases, of all nature and kind, have tried many cases to verdict, and for the last twenty years have specialized in plaintiffs' side contingency class actions, including employment class actions, unfair competition and deceptive business practice cases, and numerous consumer class actions against product manufacturers and retailers.

3. Marlin & Saltzman has had a unique firm history since commencing operations in 1985. Prior to transitioning to plaintiffs' side representation (mostly in class actions) approximately twenty years ago, the firm had previously focused entirely on the defense of class and complex litigation, such that numerous exemplar defendant side cases are therefore also included in the listing of exemplar cases set forth below. The transition to the plaintiff's side began about twenty years ago, and took about five years to complete. Since the transition was completed about fifteen years ago, the firm has focused on both employment and consumer class action cases.

1           4.       Since the transition to the plaintiffs' cause, the firm has been fortunate enough,  
2 through extremely hard work and often intense litigation, to achieve settlement and trial  
3 results which have yielded over \$900,000.000.00 in payments to the class members and  
4 clients in our cases.

5           5.       Marlin & Saltzman is extremely experienced in litigating class action cases,  
6 with well over one hundred class actions and complex commercial cases having been  
7 handled, and it has acted as lead counsel or co-lead counsel in almost all of these matters. I  
8 have been personally involved in most of the matters, and have been lead counsel within the  
9 firm on over seventy five of the matters. More information on our firm is available at the  
10 firm website [www.marlinsaltzman.com](http://www.marlinsaltzman.com).

11           6.       For the reasons addressed in support of preliminary approval, and for reasons  
12 described further in the Motion for Final Approval and for Fees, Costs and Incentives, and  
13 based on my thirty-nine (39) years maintaining an active litigation practice, I believe that  
14 Plaintiffs have prosecuted this case passionately and effectively. I believe that the Settlement  
15 is fair, adequate, reasonable, and that the Settlement sensibly accounts for the risks of further  
16 litigation, including further appeals.

17  
18 **Attorneys' Fees**

19           8.       In this case, my firm has invested over 2,500 hours, as set forth in the  
20 attached billing records. This case has been extremely actively litigated, and now sits at  
21 over nine years since filing. I have been involved in the Burnell/Saucillo matter ever  
22 since it was first brought to us by the initial filing counsel, Setareh Law Offices and The  
23 Law Offices of David Spivak. We were asked to associate in during the summer of  
24 2012, and to take the lead in the litigation and all of its complex issues. The tasks we  
25 performed required substantial staffing, although the primary lawyers involved included  
26 myself, partner Christina Humphrey, and senior associates Leslie Joyner and later David  
27 Leimbach, as well as our most senior paralegal, Susan Joseph and mid-level paralegal  
28 Jody Rosen. Others were brought in as needed for specific tasks, such as several more

1 junior paralegals who participated in handling calls from putative class members  
2 whenever we sent out letters to the class asking them to participate in the case by calling  
3 us to discuss their experiences with the Defendants.

4 Over the most critical years of the case, from 2012 to 2016, we performed  
5 extremely substantial and often very challenging work, including taking numerous PMQ  
6 depositions (seven such depositions), mostly in Phoenix, Arizona, prepared for and  
7 defended our clients' depositions (two sessions of Mr. Saucillo), and deposed third party  
8 witnesses. We also responded to two Motions for Judgments on the Pleadings, and filed  
9 and fully briefed the certification motion. In addition, we continually had to review  
10 thousands of pages of documents and pay produced by the Defendants, filed and  
11 prevailed on motions for further production, and interviewed dozens and dozens of  
12 putative class members. We also communicated regularly with our client plaintiffs, and  
13 with co-counsel and defendant. Later, after this Court denied certification, we also fully  
14 briefed a petition for Rule 23f relief, which was ultimately denied. All of our work  
15 rendered for this matter is set forth in the very detailed attached billing records,  
16 referenced below.

17  
18 Subsequently, in conjunction with counsel in the Rudsell matter, we prepared for  
19 and participated in the mediation with Mr. Rudy which ultimately led to the settlement  
20 now before the Court. Since then we have participated in the drafting of the settlement  
21 documents, the settlement approval motions, and all other related duties, including  
22 appearing at the Motion for Preliminary Approval.

23 9. My current hourly of \$925 per hour is consistent with prevailing market rates  
24 in the relevant community for attorneys of comparable skill, experience and qualifications  
25 (i.e., the Central District of California). My hourly rate is reasonable based on both my  
26 experience as a class action lawyer and the hourly rates that have been approved by judges  
27 in this District and other federal district courts in California. My hourly rate is also  
28 reasonable in light of the Laffey Matrix, which has been utilized by courts in this and other

Districts to set reasonable rates for attorneys' fees. The Laffey Matrix is available at <http://www.laffeymatrix.com/see.html>. The Laffey Matrix is adjusted for the cost of living in the Washington, D.C. area, which has a lower cost of living than the Los Angeles area, but which has a nearly identical mean wage for lawyers according to the U.S. Bureau of Labor Statistics, therefore not requiring an adjustment for Los Angeles rates. My hourly rate is below that listed in the Laffey Matrix. Indeed, the reasonable hourly rate for an attorney with more than 20 years of experience in the last published version of the study was \$899 per hour, (20+ years out of law school, whereas I am now at **39 years**), such that my current hourly rate is \$925. This is only \$26 per hour over counterparts with only 20 years experience.

The current hourly rates of the other attorneys who participated in this matter are also based upon comparisons with the rates charged in the community, as follows: Senior partner Mark Bradley, with 25 years of practice - \$850; partner Christina Humphrey, with 18 years of practice - \$800; and senior associates Leslie Joyner and David Leimbach, with 11 and 10 years respectively - \$750 and \$700. In addition, our senior-most paralegal Susan Joseph is billed at \$225 per hour, mid-level paralegal Jody Rosen is billed at \$175 per hour and several junior paralegals are billed at \$125 per hour. Due to the extreme length of the case, several of these persons are no longer with the firm, but I have included them at the hourly rates for their years and positions, at current levels.

A chart demonstrating all of the hours incurred, and by whom, is now set forth:

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
Stanley D. Saltzman	472.85	\$925	\$437,386.25
Christina A. Humprev	514.8	\$800	\$411,840.00
Leslie Jovner	634.16	\$750	\$475,620.00
David Leimbach	198.9	\$700	\$139,230.00
Susan Joseph	457.25	\$225	\$102,881.25
Marcus J. Bradley	14.5	\$850	\$12,325.00
Shannon Crosslev	5.65	\$125	\$706.25

Jody Rosen	21.2	\$175	\$3,710.00
Craig Pynes	13.55	\$800	\$10,840.00
Miscellaneous	<u>180.35</u>	<u>\$175</u>	<u>\$31,561.25</u>

<b>TOTAL</b>	<b>2513.21</b>		<b>\$1,626,100.00</b>
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Finally, attached as Exhibit 1 hereto is a true and correct compilation of my firm's hourly billings report.

**Costs Incurred**

10. To date, Marlin & Saltzman has incurred costs in this litigation in the amount of \$54,632.62. My firm's cost records report for this matter is attached hereto as Exhibit 2. These costs reflect the type of expenses typically billed by attorneys to their paying clients in the marketplace, and include such costs as filing fees, deposition transcript and video fees, travel expenses (flights and hotels, plus mileage for out of town drives or taxi/Uber rides) for many out of town depositions (Phoenix), delivery fees, etc. All of these costs were incurred only as needed, and were continuously monitored by me. We do not charge for any out of town meals by our attorneys.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed this 18th day of November, 2019, at Agoura Hills, California.

/s/ Stanley D. Saltzman  
Stanley D. Saltzman, "Declarant"

# **EXHIBIT 1**



# **EXHIBIT 1**

## **to Declaration of Stanley D. Saltzman**

Swift Transportation Class Action  
MARLIN SALTZMAN : Attorney Hours

DATE	NAME	HOURS	DESCRIPTION
8/10/2012	Stanley D. Saltzman	4.2	Meeting in BH with Mr. Setareh re possibly associating into his ongoing case against Swift (including travel time from and to Agoura Hills)
8/11/2012	Stanley D. Saltzman	5.5	Review pleadings and various case documents provided by Mr Setareh
8/15/2012	Stanley D. Saltzman	6.3	Continue study of case records and pleadings/discovery
8/15/2012	Christina A. Humphrey	5	Assist Mr. Saltzman with review and analysis of case records, and commence case research.
8/16/2012	Christina A. Humphrey	8.5	Extensive research re numerous trucking issues including preemption and FMCSA issues
8/16/2012	Stanley D. Saltzman	7	Assist with research re preemption issues.
8/22/2012	Stanley D. Saltzman	1.7	Review proposed CMC statement sent over by D counsel
8/23/2012	Christina A. Humphrey	0.5	spoke to defense counsel and corrected proposed joint case management conference statement to be submitted with court.
8/27/2012	Leslie H. Joyner	6	Leslie H. Joyner: attended court hearing (CMC) in Riverside
8/27/2012	Christina A. Humphrey	6	Attended case management conference in Riverside. (including drive time both ways)
8/27/2012	Craig Pynes	0.25	Meet with Christina re: this morning's hearing; discuss results of hearing with her and Stan;
9/21/2012	Leslie H. Joyner	6	Draft Rgs and RFPs, set one
9/24/2012	Leslie H. Joyner	9.5	Entire day on discovery, including extended conference with Mr. Saltzman and Ms. Humphrey re: RFPDs and ROGS; revise per their input.
9/24/2012	Christina A. Humphrey	7.5	Extensive conference with Ms. Joyner re various pending discovery requests, and work on responses
9/24/2012	Stanley D. Saltzman	6.5	Extensive discovery review and workup with Ms. Humphrey and Ms. Joyner
10/23/2012	Leslie H. Joyner	5.5	Work on responses to D's RFPs
10/24/2012	Leslie H. Joyner	6	Continue work on RFP responses, Burnell
10/25/2012	Leslie H. Joyner	8	responses RFPs set 2 Burnell
11/1/2012	Leslie H. Joyner	3	Finalize RFPs and ROGs to Burnell for Christina to Review - DUE MONDAY 11/5/2012
11/2/2012	Leslie H. Joyner	5.5	Burnell 2 and Pollock 1 - RFP responses
11/5/2012	Christina A. Humphrey	3.5	Burnell RFPs and Rgs set one finalized and sent.
11/6/2012	Leslie H. Joyner	2	Burnell and Pollock responses
11/7/2012	Leslie H. Joyner	1.75	responses - pollock and burnell
11/8/2012	Leslie H. Joyner	8.5	Review Client documents and organize for pollock and burnell RFP responses
11/9/2012	Leslie H. Joyner	7.5	pollock and burnell responses
11/12/2012	Leslie H. Joyner	5.5	finish draft responses - pollock and burnell

Swift Transportation Class Action  
MARLIN SALTZMAN : Attorney Hours

11/13/2012	Leslie H. Joyner	4	Finalize RFPs for Burnell and Pollock, draft key of responsive docs for CH
11/19/2012	Leslie H. Joyner	1.25	Finalize to mail Burnell Rogs set 2; Pollock Rogs set 1
11/19/2012	Leslie H. Joyner	2	Revise RFPs set 2 Burnell to mail.
11/20/2012	Leslie H. Joyner	0.5	Revise Pollock RFPs 1
11/20/2012	Leslie H. Joyner	6.5	convert image files to PDF and assemble for production
11/20/2012	Leslie H. Joyner	0.15	Make CH corrections to RFPs Burnell and Pollock
11/20/2012	Leslie H. Joyner	0.5	Draft letter to OPC re: Burnell Responsive Docs
11/20/2012	Leslie H. Joyner	0.5	Update and revise Production key for Ps
11/26/2012	Leslie H. Joyner	3	Draft PMK
12/5/2012	Leslie H. Joyner	1	Phone conference with Susan, Burnell
12/17/2012	Leslie H. Joyner	1.5	Prepare documents for production
1/2/2013	Craig Pynes	0.4	Review Notice of document production and skim documents;
1/5/2013	Leslie H. Joyner	13	Review Defendant's Discovery responses and draft meet and confer letter
1/5/2013	Stanley D. Saltzman	8.5	Assist with review of discovery received from D and assist attorney Joyner with preparing first draft of meet and confer letter.
1/14/2013	Craig Pynes	0.2	Review emails re: case status and workup;
1/15/2013	Craig Pynes	0.2	Review emails re: case workup items;
1/17/2013	Leslie H. Joyner	3	review docs produced by defendant and final M&C letter
1/28/2013	Susan Joseph	1	
1/28/2013	Christina A. Humphrey	2	1 hour preparation of conference call re meet and confer discovery; and 1 hour conference call with opposing counsel meet and confer RPD and Interr 1 to Swift and RPD and Interr 1 to Plaintiffs.
1/28/2013	Leslie H. Joyner	4	Prepare for M&C
1/28/2013	Leslie H. Joyner	2	M&C re: Discovery Responses
1/29/2013	Leslie H. Joyner	0.5	Draft confirming email re: M&C
2/6/2013	Christina A. Humphrey	0.5	Meeting with Leslie re supplementing Plaintiff's discovery, PMK, and status of case.
2/6/2013	Christina A. Humphrey	0.3	Discussion with Batza re investigation re drivers and compensation schemes.
2/6/2013	Christina A. Humphrey	0.1	reviewed draft PMK.
2/7/2013	Leslie H. Joyner	3	Supp rogs/RFPs pollock/burnell

Swift Transportation Class Action  
MARLIN SALTZMAN : Attorney Hours

2/7/2013	Christina A. Humphrey	1.2	Reviewed and edited PMK notice.
2/7/2013	Stanley D. Saltzman	2.2	Review and approve the proposed PMK notice and categories to be addressed
2/8/2013	Leslie H. Joyner	3	Discovery responses by Defendant. categorize for call
2/8/2013	Christina A. Humphrey	1.4	Leslie and I met re Defendant's discovery responses (Set One) to prepare for meet and confer meeting with opposing counsel.
2/8/2013	Christina A. Humphrey	0.6	Meet and confer with opposing counsel re Defendant's discovery responses (Set One); discussion of production of class list, partial meet and confer on Def. Motion for Judgment on the Pleadings, and meet and confer moving class discovery deadline.
2/8/2013	Christina A. Humphrey	0.5	Discussion/email of PMK notice to opposing counsel and email outlining stip to move deadlines for class cert.
2/8/2013	Christina A. Humphrey	3.5	Pulled and examined complaint of related case filed in Northern District to determine whether the claims made in our case overlapped the claims in that case. Discussion with Mark and STan.
2/8/2013	Leslie H. Joyner	0.5	meet & confer
2/8/2013	Christina A. Humphrey	0.5	Drafted meet and confer confirmation email re class list and payroll database (all requested in discovery) all discussed in conference call 2/8/13.
2/8/2013	Christina A. Humphrey	0.3	
2/8/2013	Stanley D. Saltzman	2.5	Partner conference re. action filed in the Northern District
2/11/2013	Leslie H. Joyner	0.5	Meet & Confer
2/11/2013	Christina A. Humphrey	1.5	Conference call with opposing counsel re Defendant's discovery responses to Special Rgs Set One and RPD 3.
2/12/2013	Christina A. Humphrey	0.2	Edited/drafted letter to opposing counsel re electronic preservation of data.
2/12/2013	Christina A. Humphrey	0.5	Researched local rules/FRCP re deposition notices and dates; discussed strategy to get discovery completed in Swift in time for certification with Stan.
2/12/2013	Leslie H. Joyner	3	meet and confer letter
2/13/2013	Christina A. Humphrey	1.2	Drafted email re meet and confer certification deadlines, def motion for judgment on the pleadings, def discovery responses, strategize with Stan Saltzman.
2/14/2013	Leslie H. Joyner	2.5	Draft disc. letter, contact (attempt to) Ps re: supp responses.
2/15/2013	Leslie H. Joyner	3.75	Discuss case with Burnell; further review of responses to discovery.
2/15/2013	Susan Joseph	1.2	Telephone call with Deb Pollock; Telephone call with Jack Pollock; e-mail to client re same.
2/15/2013	Stanley D. Saltzman	3	Review supplemental discovery responses.
2/15/2013	Stanley D. Saltzman	2.5	Prepare outline of likely motion areas for motions to compel as to D's responses to numerous discovery issues.

Swift Transportation Class Action  
MARLIN SALTZMAN : Attorney Hours

2/16/2013	Leslie H. Joyner	6.5	Research re. possible Discovery Motions
2/17/2013	Leslie H. Joyner	10	Rogs/RFPs/PMK
2/18/2013	Leslie H. Joyner	8.5	PMK/ROGS/RFPS
2/19/2013	Leslie H. Joyner	6.5	PMK preparation
2/19/2013	Christina A. Humphrey	1.2	edits to joint stip for motioni to compel discovery responses.
2/20/2013	Susan Joseph	2.5	Conference call; communciation re data; review materials re data
2/20/2013	Leslie H. Joyner	2	Rog/RFPs and stip
2/20/2013	Leslie H. Joyner	0.5	email clients RE: depo dates and verifications
2/20/2013	Leslie H. Joyner	2.75	review pmk categories and outstanding discovery issues for conference call; conference call with CAH, SJ and OPC; meeting with Christina...
2/21/2013	Christina A. Humphrey	2.75	review pmk categories and outstanding discovery issues for conference call; conference call with Leslie, SJ and OPC; meeting with Leslie...
2/23/2013	Leslie H. Joyner	0.15	call/email pollock/burnell about depositions - urgent
2/25/2013	Susan Joseph	0.5	Telephone conference with client.
3/7/2013	Craig Pynes	2.4	Review emails re: various case workup issues; review complaint re: case background; discuss same and workup with Susan; prepare email to Christina, etc. on workup issues; meet with Leslie re: motion to amend; discuss same with Christina; review system and
3/7/2013	Leslie H. Joyner	1	Pollock RFPs, contact client's wife
3/7/2013	Leslie H. Joyner	5	Dismissal of Pollock; leave to amend to add new plaintiff, motion to intervene, etc
3/8/2013	Craig Pynes	0.6	Review and respond to emails with Christina re: stipulation to drop plaintiff, amending complaint and other issues; review other emails re: same; review stip and emails re: same; research numbers for and cold call putative class members on list;
3/8/2013	Christina A. Humphrey	1.2	edited discovery motion to compel interrogatories and rfp.
3/11/2013	Craig Pynes	0.6	Continue calling potential class reps; review and respond to emails with Chrstina re: same;
3/12/2013	Christina A. Humphrey	0.2	conference call Paul Cowie re discovery, dates PMK.
3/12/2013	Craig Pynes	1.4	Continue calling putative class members to locate class rep; review and respond to email with Christina re: same; prepare emails to them re: same; Interview Sam Cunanan re: trucking issues and acting as a class rep; prepare email to Stan and Christina re:
3/13/2013	Christina A. Humphrey	0.3	edited pre-cert letter.

Swift Transportation Class Action  
MARLIN SALTZMAN : Attorney Hours

3/13/2013	Craig Pynes	0.5	Review court order approving stip continuing deadlines and email re: same; review and respond to emails re: same; print out copy for SDS; review meet and confer emails;
3/15/2013	Craig Pynes	0.2	Review emails re; payroll data discovery;
3/19/2013	Craig Pynes	0.6	Review multiple emails re: production and depositions; telephone calls to potential class representatives;
3/21/2013	Craig Pynes	2.4	Telephone conferences with class list members re: acting as class reprs; meet with Mr. Saltzman re: same;
3/21/2013	Susan Joseph	0.3	Conference call re production of pay plans.
3/21/2013	Leslie H. Joyner	0.2	draft emails to burnell re depo dates
3/21/2013	Leslie H. Joyner	0.5	conference with CAH, SJ and OPC re: Rogs and RFPS
3/21/2013	Stanley D. Saltzman	1.5	Review ongoing results of call with class members and meet with Mr. Pynes
3/22/2013	Christina A. Humphrey	2.5	Review statewide distribution of mailing list for letters to putative class members.
3/26/2013	Karin Turner	3.8	Send letters to putative class members.
3/26/2013	Leslie H. Joyner	0.1	Email to Burnell re: depo dates
3/26/2013	Stanley D. Saltzman	5	Begin to prepare detailed outline of questionnaire for callers from letter to be mailed to class members.
3/26/2013	Stanley D. Saltzman	2.5	Confer with staff re. interviews of callers.
3/26/2013	Leslie H. Joyner	0.5	Conference call with OPC Cowie, SJ, SS, CH re: Driver pay and MTC Rogs and RFPs
3/28/2013	Susan Joseph	8	Various tasks related to pre-cert notice including: organizing calls, interviewing drivers, revising interview form, updating spreadsheet, memorializing conversations, e-mails and conferences re same.
3/29/2013	Susan Joseph	4	Various tasks related to pre-cert notice including: organizing calls, interviewing drivers, revising interview form, updating spreadsheet, memorializing conversations, e-mails and conferences re same.
3/29/2013	Scott Sexton	3.5	Various tasks related to pre-cert notice.
4/1/2013	Leslie H. Joyner	2.1	T/C with client and explanation of letters being mailed out to the class of drivers. Address his concerns
4/1/2013	Susan Joseph	7	Various tasks related to pre-cert notice including: organizing calls, interviewing drivers, revising interview form, updating spreadsheet, memorializing conversations, e-mails and conferences re same.
4/1/2013	Craig Pynes	0.2	Review emails re: responding to calls;
4/2/2013	Susan Joseph	9	Various tasks related to pre-cert notice including: organizing calls, interviewing drivers, revising interview form, updating spreadsheet, memorializing conversations, e-mails and conferences re same.
4/2/2013	Stanley D. Saltzman	2.5	Confer with staff receiving calls regarding initial feedback from the callers.
4/2/2013	Karin Turner	1.1	Interview with putative class member;

Swift Transportation Class Action  
MARLIN SALTZMAN : Attorney Hours

4/2/2013	Leslie H. Joyner	0.5	Call with OPC re: Discovery and MTC
4/3/2013	Jody Rosen	1.5	Handle call from class member
4/3/2013	Jody Rosen	0.5	Interviewed Stanley Wilard, a class member
4/3/2013	Jody Rosen	0.7	interviewed Rod Couch, a class member
4/4/2013	Susan Joseph	7	Various tasks related to pre-cert notice including: organizing calls, interviewing drivers, revising interview form, updating spreadsheet, memorializing conversations, e-mails and conferences re same.
4/4/2013	Jody Rosen	1.5	interviewed two class members
4/4/2013	Jody Rosen	0.5	interviewed David Cote, a class member
4/4/2013	Karin Turner	0.4	Update class member addresses to spreadsheet.
4/4/2013	Jody Rosen	0.4	Interviewed George Billow, a class member
4/5/2013	Susan Joseph	3	Various tasks related to pre-cert notice including: organizing calls, interviewing drivers, revising interview form, updating spreadsheet, memorializing conversations, e-mails and conferences re same.
4/5/2013	Jody Rosen	0.4	interviewed Conrad Nepote, a class member
4/5/2013	Leslie H. Joyner	4.5	Review numerous client interviews prepared by paralegals
4/5/2013	Jody Rosen	0.4	interviewed Cindy, a class member
4/5/2013	Jody Rosen	0.5	interviewed Ronda Campbell, a class member
4/5/2013	Jody Rosen	0.45	Interviewed Jacques Reid, a class member
4/5/2013	Jody Rosen	0.3	interviewed Perry Barnett, a class member
4/5/2013	Karin Turner	0.6	Interview with putative class member.
4/6/2013	Karin Turner	0.15	Update putative class member addresses.
4/8/2013	Jody Rosen	0.3	interviewed Glenn DelHiero, a class member
4/8/2013	Jody Rosen	0.3	interviewed Luis Rios, a class member
4/8/2013	Jody Rosen	0.25	interviewed Hugo Hilesos, a class member
4/8/2013	Jody Rosen	0.2	Interviewed Charles Smith, a class member
4/8/2013	Jody Rosen	0.5	Interviewed Michael O'Brien, a class member
4/8/2013	Jody Rosen	0.5	interviewed Joel Alvarado, a class member
4/8/2013	Jody Rosen	0.45	interviewed Jonathan Hill, a class member
4/8/2013	Jody Rosen	0.35	Spoke with Jamshid Rajabpoor, a class member

Swift Transportation Class Action  
MARLIN SALTZMAN : Attorney Hours

4/8/2013	Shannon Crossley	0.5	Call from Class Member
4/9/2013	Jody Rosen	0.8	Interviewed Melvin Jones, a class member
4/9/2013	Jody Rosen	0.25	interviewed Ronald Powers, a class member
4/9/2013	Shannon Crossley	0.55	Interviewed Steve McCarter.
4/9/2013	Jody Rosen	0.65	interviewed Gil Marquez, a class member
4/9/2013	Shannon Crossley	0.3	Interviewed Dale Johnson.
4/9/2013	Jody Rosen	0.4	interviewed Les Johnson, a class member
4/9/2013	Shannon Crossley	0.25	Interviewed Carl Converse
4/9/2013	Shannon Crossley	0.3	Interviewed German Nava
4/9/2013	Shannon Crossley	0.25	Interviewed Jerry McGill
4/9/2013	Shannon Crossley	0.45	Interviewed Robert Placentia
4/9/2013	Shannon Crossley	0.25	Interviewed Gregory Wilson
4/9/2013	Jody Rosen	0.4	interviewed Kevin Connors, a class member
4/9/2013	Karin Turner	0.4	Interview with putative class member.
4/9/2013	Shannon Crossley	1.1	Further caller from class member
4/9/2013	Karin Turner	0.7	Interview with putative class member.
4/9/2013	Karin Turner	0.7	Interview with putative class member.
4/9/2013	Jody Rosen	0.25	interviewed Candace Byers, a class member
4/10/2013	Jody Rosen	0.25	interviewed Edward Avilez, a class member
4/10/2013	Jody Rosen	0.5	interviewed Robert Bailey, a class member
4/10/2013	Jody Rosen	0.45	interviewed Charles Fitts, a class member
4/10/2013	Shannon Crossley	0.4	Interviewed Leonard Bennett
4/10/2013	Leslie H. Joyner	1.25	Call from client Burnell
4/10/2013	Jody Rosen	0.25	interviewed Jose Ramirez, a class member
4/10/2013	Leslie H. Joyner	0.33	finalize Burnell Supp RFPS
4/10/2013	Jody Rosen	0.25	interviewed Matthew Escarcega, a class member
4/10/2013	Jody Rosen	0.35	interviewed Marty Padilla, a class member
4/10/2013	Jody Rosen	0.3	interviewed Wenford Morgan, a class member



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4/10/2013	Shannon Crossley	0.25	Interviewed James Presz
4/11/2013	Jody Rosen	0.2	Interviewed Don Lingenfelter, a potential class member
4/11/2013	Jody Rosen	0.55	Interviewed Joyce Bell, a class member
4/11/2013	Shannon Crossley	0.25	Interviewed Marissa Harding.
4/11/2013	Shannon Crossley	0.2	Interviewed Anthony Callaghan
4/12/2013	Jody Rosen	0.25	Interviewed Peter, a potential class member
4/12/2013	Jody Rosen	0.35	interviewed Donald Trigg, a class member
4/15/2013	Shannon Crossley	0.6	Interviewed Dwayne and Robert Lane (Brothers)
4/16/2013	Jody Rosen	0.35	Interviewed Shaun Layton, a possible class member
4/16/2013	Jody Rosen	0.25	interviewed Jacqueline White, a possible class member
4/16/2013	Jody Rosen	0.25	interviewed Fernando Borja, a class member
4/16/2013	Susan Joseph	9.5	Begin organizing memos of calls from Class contacts, review and organize questionnaires, update call list.
4/16/2013	Jody Rosen	0.75	interviewed Bard Desaboya, a class member
4/16/2013	Leslie H. Joyner	7.5	opposition to MJOP
4/17/2013	Susan Joseph	2	Class contacts including interviews, review and organize questionnaires, update call list. Detailed interview with Gilbert Saucillo, report re same.
4/17/2013	Jody Rosen	0.5	interviewed Alberto Marines, a class member
4/17/2013	Leslie H. Joyner	9	Work on Opp to MJOP
4/18/2013	Leslie H. Joyner	8.5	Continue work on OPP to MJOP
4/18/2013	Stanley D. Saltzman	6	Review ongoing draft of opp to critical motion for judgment on the pleadings; confer with associate re the same.
4/19/2013	Leslie H. Joyner	8.5	New cases; revise Opp MJOP
4/19/2013	Leslie H. Joyner	2	Opposition; revise Brinker and Cole sections
4/20/2013	Leslie H. Joyner	6.5	Revise citations; final doc for filing (extract meta data)
4/20/2013	Stanley D. Saltzman	7	Review near final draft of opp to MJOP, and make edits and suggestions throughout. Return to associate for further finalizing.
4/22/2013	Jody Rosen	0.3	Interviewed Jo Dunca, a potential class member
4/22/2013	Jody Rosen	0.35	Interviewed Nicole La Mothe, a possible class member
4/22/2013	Leslie H. Joyner	7	revise Motion; insert TOA; draft RJN, prepare exhibits to RJN; draft proposed order; prepare for filing

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4/23/2013	Susan Joseph	1	Class member interviews.
4/29/2013	Leslie H. Joyner	2.75	Review Reply Opp MJOP
4/30/2013	Leslie H. Joyner	1.5	Telecon with plaintiff Burnell
4/30/2013	Stanley D. Saltzman	3.5	Review and analysis of D's Reply to the MJOP
5/2/2013	Jody Rosen	0.8	interviewed a swift driver
5/2/2013	Jody Rosen	1.2	interviewed Adam Lev, a class member
5/2/2013	Christina A. Humphrey	1.1	draft stip to continue cert dates; emailed to opp counsel.
5/2/2013	Craig Pynes	0.4	Discuss with Christina re: prior driver who may be able to act as class rep; telephone conferences with driver re: same;
5/8/2013	Leslie H. Joyner	2.5	Pull cases for motion
5/8/2013	Stanley D. Saltzman	7.3	Work on preparation for oral argument on upcoming motion
5/9/2013	Craig Pynes	1.4	Review case information and prepare email to Mr. Saltzman re: same; discuss same with Leslie; review and respond to emails with her re: same;
5/10/2013	Leslie H. Joyner	8	Re: issues raised in in Swifts Rply MJOP; draft memo
5/11/2013	Christina A. Humphrey	6.5	Prepared for oral argument on Def. Motion for Judgment on the Pleadings scheduled for May 13; re-reviewed all cases and arguments
5/12/2013	Christina A. Humphrey	10	Prepared for hearing on Def Moton for Judgment on the Pleadings scheduled Monday, May 13.
5/12/2013	Leslie H. Joyner	4.75	Internal work up for swift hearing
5/12/2013	Stanley D. Saltzman	6.5	Worked with Ms. Humphrey in preparing for hearing on MJOP; outlining of issues for oral argument.
5/13/2013	Craig Pynes	0.7	Review emails re: reply arguments; review reply brief;
5/13/2013	Christina A. Humphrey	11	Travelled, prepared for (reviewed new US Supreme Court case Pelkey), and attended hearing on Defendant's Motion for Judgment on the Pleadings; research after returning to Agoura Hills office.
5/13/2013	Leslie H. Joyner	12	Research re new Pelkey decision, travel to and from Riverside for Swift MJOP; further research upon return to office.
5/14/2013	Susan Joseph	1	Class member contacts.
5/14/2013	Leslie H. Joyner	9	Research re Pelkey decision; begin supp briefing
5/21/2013	Christina A. Humphrey	1.1	Interviewed Gilbert Saucillo and spoke at length about serving as a rep plaintiff.
5/21/2013	Leslie H. Joyner	7.5	Preemption research; nationwide research
5/22/2013	Christina A. Humphrey	0.2	spoke to potential class member re her husband's passing and wehther or not the estate can make a claim.
5/24/2013	Christina A. Humphrey	0.1	drafted email to opposing counsel re stip to continue class cert dates and meet and confer re discovery.

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5/24/2013	Leslie H. Joyner	7	Research re withdrawal of named plaintiff, motion to amend vs. intervene
5/28/2013	Christina A. Humphrey	0.9	reviewed retainer and letter to new plaintiff Saucillo
5/31/2013	Leslie H. Joyner	5.5	Research re. appeal of ruling on MJOP
6/3/2013	Christina A. Humphrey	6.4	researched proper procedure to appeal and timeline for appeal, pulled Rule 54 motions.
6/3/2013	Christina A. Humphrey	1.1	re-formatted stipulation to continue certification deadlines, drafted email to opposing counsel addressing deadlines, and various other discovery issues; discussion with Stan re stip dates.
6/3/2013	Stanley D. Saltzman	5	Join in researching our appellate rights and procedures re. MJOP
6/25/2013	Leslie H. Joyner	11.25	draft motion to amend to add new P, legal research, amended complaint, conferences on intervention vs. amending, stip to withdraw Pollock
6/25/2013	Stanley D. Saltzman	5.5	Work with Ms. Joyner on amendment of complaint issues, new plaintiff and research re all relevant issues.
6/26/2013	Leslie H. Joyner	6.5	Prepare notice of appeal; motion for entry of final judgment
6/26/2013	Leslie H. Joyner	1.5	appeals and intervention vs amending: discuss with Kiley
7/1/2013	Susan Joseph	0.25	Communications.
7/2/2013	Leslie H. Joyner	1.5	Discuss Pollock, appeal, amend v. intervention
7/2/2013	Christina A. Humphrey	1.5	Discuss Pollock, appeal, amend v. intervention
7/11/2013	Leslie H. Joyner	11	Research and work on motion to file SAC adding new class rep
7/14/2013	Leslie H. Joyner	7	Draft Opp MTN Stay and prepare Exhibits
7/15/2013	Christina A. Humphrey	6.5	Edited and finalized Opposition to Motion to Stay case.
7/15/2013	Leslie H. Joyner	7	Opp Motion to Stay
7/15/2013	Leslie H. Joyner	3	For leave to File SAC
7/16/2013	Christina A. Humphrey	1.7	edited and reviewed Rule 54 notice of motion, motion, proposed order, and declaration of christina a humphrey in support thereof.
7/16/2013	Leslie H. Joyner	9.5	finalize motion for entry final judgment and motion to file SAC; draft two declaration for CAH; prepare exhibits to Motion to file SAC; draft proposed Orders for both motions; draft/finalize three stips (Pollock withdraw, move hearing dates and final judg
7/19/2013	Leslie H. Joyner	1.5	3 stips and orders, communicate with OPC, prepare for filing
7/22/2013	Christina A. Humphrey	0.25	Spoke with rep plaintiff re various occurrences at work.
7/30/2013	Christina A. Humphrey	2.5	Reviewed opp Motion for Rule 54 and opp Motion to amend to add Saucillo, discussed with Leslie.
7/30/2013	Leslie H. Joyner	6.5	RE replies to D's Opps to motions to amend complaint and ofr entry of final judgment pursuant to rule 54b on meal and rest break claims

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7/31/2013	Leslie H. Joyner	8.5	legal ad factual research (communications with counsel and discovery) - draft reply ISO Motion for Final Judgment; begin drafting Reply ISO motion SAC
8/1/2013	Leslie H. Joyner	7.25	Legal and factual research on D's claims in Opposition to Ps' motion to file SAC; conference with Saltzman and Humphrey re: responses, revise into and develop legal argument.
8/1/2013	Stanley D. Saltzman	4.3	Work with Ms. Joyner on reply to D's opp to the motion to amend
8/2/2013	Leslie H. Joyner	0.75	Stip and Order
8/2/2013	Leslie H. Joyner	5	revise reply ISO entry final judgment re dilts MSJ; distinguishes cases and rules cited by defendant for Reply ISO motion to amend - legal research.
8/5/2013	Leslie H. Joyner	3	revise replies per CAH, draft CAH dec. prepare exhibit, meet with SDS re stip, revise Stip
8/5/2013	Susan Joseph	0.5	re Reply
8/6/2013	Christina A. Humphrey	7	Revised reply briefs and declarations, reviewed exhibits in support of motion to amend and motion for final judgment.
8/19/2013	Craig Pynes	0.2	Discuss with Stan re: today's hearing;
8/19/2013	Leslie H. Joyner	7.5	Prepare binder of motions, Oppositions and replies; Pull stip and order for court; Hearing in Riverside at 2pm
8/20/2013	Christina A. Humphrey	9.5	Prepared for hearing on Def Motion to Stay, PI Motion for Final Judgment, PI Motion to Amend Complaint, attended hearing on motions.
8/23/2013	Craig Pynes	1.1	Review Court's Minute Order Granting and Denying Various motions; review and respond to emails with Sandy re: same;
9/3/2013	Christina A. Humphrey	3.75	edited notice of appeal, researched rule re filing notice of appeal, designating transcript, and filing fee.
9/10/2013	Leslie H. Joyner	2	review discovery status of case from where we left off for conference call with defense counsel
9/10/2013	Christina A. Humphrey	0.25	Conference call with opposing counsel re discovery issues.
9/10/2013	Christina A. Humphrey	0.5	reviewed email confirming meet and confer issues; looked at dates for possible PMKs.
9/10/2013	Leslie H. Joyner	0.25	Conference call re: discovery issues
9/10/2013	Susan Joseph	2	Review, index and summarize discovery.
9/10/2013	Leslie H. Joyner	4	Meet with Mr. Saltzman and review discovery from where left off in April for M&C letter and email
9/10/2013	Leslie H. Joyner	2.75	DRaft M&C letter re Plaintiffs' and Defendant's outstanding discovery obligations.
9/10/2013	Leslie H. Joyner	0.75	Draft email from CAH to OPC re: telephone conference
9/10/2013	Stanley D. Saltzman	3	Meet with Ms. Joyner to go over pending discovery from prior to recent motion work
9/11/2013	Susan Joseph	1	Review, index and summarize discovery; prepare PMK notice.
9/11/2013	Leslie H. Joyner	8.25	RFPs set two, revise M&C letter, prepare docs for production, revise/update Burnell Supp RFPs and Rgs

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9/16/2013	Leslie H. Joyner	1.3	Supp rogs/ rfps burnell - finalize and send. review saucillo requests
9/16/2013	Christina A. Humphrey	2	edited supplemental discovery responses for Burnell; drafted email re edits and issues to follow up on for collecting docs.
9/16/2013	Christina A. Humphrey	0.4	reviewed meet and confer letter to opposing counsel re Def responses to RPD 1 and Sp Rogs 1.
9/16/2013	Christina A. Humphrey	0.5	reviewed, edited, and added to Plaintiff's Request for Production of Docs to Def. Set No. 2.
9/23/2013	Susan Joseph	0.5	Discuss PMK with CAH and LHJ
9/23/2013	Christina A. Humphrey	0.5	spoke to putative class member Bart Desboya re potential claims and interviewed regarding his terminal and complaints.
9/23/2013	Christina A. Humphrey	1.1	Interviewed Gilbert Saucillo re various facts pertinent to meeting and conferring regarding scope of PMK notice.
9/23/2013	Stanley D. Saltzman	2.5	Studied D's 10-K filings and referred to Ms. Humphrey for further analysis.
9/24/2013	Christina A. Humphrey	5	researched Swift's website, 10-k report, and drafted meet and confer letter re how to narrow down the categories for PMK.
9/25/2013	Christina A. Humphrey	0.6	drafted response to mediation questionnaire.
9/25/2013	Christina A. Humphrey	1.4	drafted PMK notice for categories 12-13.
9/27/2013	Christina A. Humphrey	0.9	Interviewed former manager Randolph Boots, emailed others.
9/30/2013	Susan Joseph	0.25	Tel con with Saucillo; e-mail re same
10/1/2013	Christina A. Humphrey	0.6	reviewed docket/analyzed rule for designating transcript, etc.
10/1/2013	Christina A. Humphrey	0.6	Examined rule designating transcript for appeal, emails, edited marking of docket for designation.
10/1/2013	Christina A. Humphrey	0.3	Read letters from opposing counsel re production of pay packages and meet and confer letter to file a motion for judgment on the pleadings.
10/1/2013	Leslie H. Joyner	2.4	Appeal deadlines
10/3/2013	Leslie H. Joyner	0.6	set up saucillo initial disclosures
10/3/2013	Leslie H. Joyner	0.5	Letter and verification to saucillo
10/4/2013	Christina A. Humphrey	0.1	email to opposing counsel re appellate transcript.
10/9/2013	Leslie H. Joyner	1.2	Saucillo re discovery responses and initial disclosures
10/9/2013	Leslie H. Joyner	1.8	Finalize Rog and RFP responses due 10/16 and 10/18; draft initial disclosures
10/10/2013	Leslie H. Joyner	0.75	Pull docket items for appeal
10/10/2013	Leslie H. Joyner	0.8	Appeal rules - 9th cir.
10/11/2013	Christina A. Humphrey	1.4	reviewed Ruan case, spoke to Stan, drafted emails re thoughts and responses to Defendant's Sept 27 meet and confer letter.

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10/11/2013	Leslie H. Joyner	0.75	Subpoena and doc request - qualcomm
10/12/2013	Leslie H. Joyner	0.2	revise ESI letter
10/16/2013	Christina A. Humphrey	1.1	Edited Saucillo's responses to Def RPD Set one, 1-26.
10/17/2013	Christina A. Humphrey	1.4	edited Saucillo's responses to RPD 27-60.
10/17/2013	Christina A. Humphrey	0.1	email communication with Paul Cowie re stip to extend responses to discovery and email setting forth terms of briefing schedule for FAAAA against wages.
10/17/2013	Leslie H. Joyner	1	Make changes to responses, collect documents, mail to Swift
10/21/2013	Christina A. Humphrey	0.3	Drafted email to opposing counsel re briefing schedule for Defendant 12(b)(6).
10/22/2013	Christina A. Humphrey	0.7	reviewed and edited follow up ESI preservation letter to SWift.
10/22/2013	Stanley D. Saltzman	7.5	Begin to review recently produced pay plans
10/30/2013	Christina A. Humphrey	0.4	drafted email paul cowie re moving class cert deadline dates; reviewed dates to determine briefing schedule.
11/11/2013	Christina A. Humphrey	0.4	Discussion with Paul Cowie re extension outstanding discovery and preservation of ESI data.
11/18/2013	Leslie H. Joyner	0.75	Draft PMK Notice on Customer contracts
1/3/2014	Christina A. Humphrey	1.1	reviewed and edited Saucillo's responses to Spec Rogs 1 and obtained verification.
1/3/2014	Christina A. Humphrey	2.2	drafted meet and confer letter re Def objections to 30(b)(6) 1-3 categories in relation to Def Motion for Judgment on the Pleadings FAAAA wages.
1/3/2014	Christina A. Humphrey	0.4	reviewed Defendant's ESI letter dated December 13 and looked up past ESI letters.
1/3/2014	Christina A. Humphrey	0.5	reviewed Defendant's meet and confer letter re Saucillo's responses to RFP 1, reviewed responses in conjunction with letter.
1/6/2014	Christina A. Humphrey	0.2	edited letter re 30(b)(6) and finalized/sent out.
1/6/2014	Stanley D. Saltzman	5.75	Review Swift's MJOP re: wage claims and set up outline for opposition
1/6/2014	Leslie H. Joyner	4.25	Review Dilts, Aguiar, Esquivel, Cole, Swift Order Granting MJOP re: meal and rest Break claims, Jasper, Mendez, Brown, Dillingham, Quezada, Burnham, Campbell.
1/6/2014	Leslie H. Joyner	3.5	Set up and begin Drafting MJOP sections on Plaintiffs claims; Wage order 9; LC section 200; effect of wage laws on prices, routes, services; Burnham.
1/7/2014	Christina A. Humphrey	1.1	reviewed ESI letters (all of them sent in the case) to prepare for drafting of latest ESI letter.
1/7/2014	Leslie H. Joyner	1.5	Draft intro to opposition to MJOP wage claims
1/7/2014	Leslie H. Joyner	0.25	Call with Ninth Circuit Mediator
1/7/2014	Christina A. Humphrey	0.3	Assessment conference with 9th Circuit mediator Lisa Jaye to determine whether or not the case is appropriate for mediation.
1/7/2014	Christina A. Humphrey	0.2	examined Rule 27 and Rutter guide re: filing a motion to stay appellate proceedings pending outcome of Dilts.

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1/7/2014	Christina A. Humphrey	0.2	drafted email to opposing counsel re meet and confer stay appeal pending dilts.
1/7/2014	Leslie H. Joyner	1.25	re: motion to stay 9th circuit proceedings
1/7/2014	Christina A. Humphrey	1.1	Drafting letter to respond to meet and confer letter re Saucillo's responses to RPD 1: responding to November 25 meet and confer letter. Research whether or not plaintiffs must disclose names of those who Plaintiff sent a precert letter to.
1/7/2014	Leslie H. Joyner	5.5	Draft Motion to Stay Appellate proceedings pending 9th circuit decision in Dilts and Campbell
1/7/2014	Stanley D. Saltzman	3.7	Research and meetings re. motion to stay pending appellate review
1/8/2014	Susan Joseph	7	Prepare supplemental discovery responses
1/8/2014	Christina A. Humphrey	2.2	drafted meet and confer letter discovery, and researched whether or not Plaintiff has to produce information received from putative class members.
1/8/2014	Leslie H. Joyner	4.4	Finish Motion to Stay appellate proceedings
1/8/2014	Christina A. Humphrey	1.8	drafted meet and confer letter re Swift's responses to Saucillo's RPD 2.
1/8/2014	Leslie H. Joyner	4	revise and draft introduction to Ps' opp mjop wage claims
1/9/2014	Susan Joseph	2.5	Prepare supplemental discovery responses
1/9/2014	Christina A. Humphrey	7.2	Researched ESI discovery issues; reviewed all prior drafts of ESI letters in this case, reviewed discovery in conjunction with ESI, drafted letter in response to Defendant's December 13, 2013, ESI letter.
1/9/2014	Leslie H. Joyner	9	Draft Opposition to MJOP - wage claims
1/13/2014	Susan Joseph	0.5	Prepare supplemental discovery responses.
1/13/2014	Christina A. Humphrey	2.2	edited Sacillo's responses to RPD 1, and accompanying meet and confer letter.
1/13/2014	Christina A. Humphrey	0.2	edited Saucillo's initial disclosures.
1/13/2014	Christina A. Humphrey	0.5	reviewed motion to stay proceedings.
1/13/2014	Leslie H. Joyner	9.5	Work on Opp to MJOP - scope of preemption, burnham and weight of authority sections
1/13/2014	Stanley D. Saltzman	6.5	Research and work on preemption issues raised in latest motion from D
1/14/2014	Susan Joseph	0.5	Communications re plaintiffs' supplemental discovery responses.
1/14/2014	Leslie H. Joyner	10.6	read through draft of motion so far, make edits and restructure sections, complete section on burnham, weight of authority and begin section specific to prices.
1/15/2014	Leslie H. Joyner	2.25	Edit and finalize Motion to stay appellate proceedings. Draft declaration of CAH and add cites to motion.
1/15/2014	Leslie H. Joyner	6.5	Draft joint stip re: motion to compel PMK and doc production re customer contracts/pricing
1/16/2014	Susan Joseph	3.5	Discovery review, index and summary; assist with motion to compel.



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1/16/2014	Leslie H. Joyner	5.5	Finish Motion to Compel Depo and Doc Requests; draft Decl of CAH, locate and prepare Exhibits A-H
1/17/2014	Leslie H. Joyner	3.5	Finalize Motion to compel and prepare for filing
1/17/2014	Leslie H. Joyner	1	preparing and filing motion to stay
1/17/2014	Leslie H. Joyner	4.5	Revise opposition to Swift's MJOP and begin addressing the derivative claims section
1/21/2014	Christina A. Humphrey	4.7	edited opp motionf or judgment pleadings.
1/23/2014	Susan Joseph	0.5	Class member interview.
1/23/2014	Leslie H. Joyner	9	Make revisions and addition to opposition per Saltzman and Humphrey's edits and notes. Begin building remainder of effect on prices section. Draft Declaration of CAH, Prepare RFJN and exhibits.
1/23/2014	Leslie H. Joyner	1	Draft services and routes sections of Opp
1/24/2014	Leslie H. Joyner	5.5	Proof read opposition, finish drafting derivative claim section, format document, create and insert tables, finalize for filing
1/24/2014	Stanley D. Saltzman	5.25	Read, review and edit near final draft of opp to motion for JOP
1/27/2014	Leslie H. Joyner	1.5	Draft subpoena for documents to comdata
1/27/2014	Leslie H. Joyner	0.5	Resrach filing for motion to compel, process, page lengths, section page lengths
1/28/2014	Christina A. Humphrey	0.5	Researched discoverability of docs sent to Plaintiffs by class members, and applicability of attorney client privilege and work product doctrine.
1/28/2014	Christina A. Humphrey	1.7	reviewed documents from Michael Fisher, Melvin Jones, and Thomas Ball, drafted email summarizing.
1/29/2014	Leslie H. Joyner	3.5	Draft Meet and confer letter regarding Defendant's responses to Plaintiffs' RFPs Set No. 2 and documents produced.
1/30/2014	Christina A. Humphrey	0.9	Finalized 2 meet and confer letters and supplemental discovery responses. - dated January 30. Saucillo.
3/17/2014	Leslie H. Joyner	4.2	Summarize FAAAA cases in an email for hearing on MJOP, in particular mendonca, rowe and pelkey and the cases upon which D's rely.
3/27/2014	Leslie H. Joyner	0.25	Review Order denying MJOP RE wage claims
4/14/2014	Susan Joseph	0.5	Review file re status of PMK
4/14/2014	Christina A. Humphrey	1.8	prepared for conference call with counsel by reviewing prior discovery and correspondence pertaining to discovery.
4/14/2014	Christina A. Humphrey	0.5	conference call with opposing counsel re case update/discovery.
4/14/2014	Leslie H. Joyner	3.8	Review discovery, PMk notice - where we left off. summarize
4/14/2014	Leslie H. Joyner	0.5	meet and confer with OPC re: reviving discovery
4/14/2014	Stanley D. Saltzman	4.5	Research re. American pipe - tolling of SOL while meal and rest break claims are on appeal



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4/21/2014	Christina A. Humphrey	2.1	reviewed prior depo notices (3) and located former correspondence relating to depo notices, crafted email summarizing position re upcoming 30(b)(6) notices in preparation for conference call with opp counsel.
4/21/2014	Susan Joseph	5	Discovery review, index and summary.
4/22/2014	Susan Joseph	3	Discovery review, index and summary.
4/23/2014	Susan Joseph	5	Discovery review, index and summary.
4/24/2014	Susan Joseph	2	Discovery review, index and summary.
4/25/2014	Susan Joseph	3	Discovery review, index and summary.
4/28/2014	Susan Joseph	2	Discovery review, index and summary.
4/29/2014	Leslie H. Joyner	0.25	Meet and confer with Cowie re: outstanding discovery issues and pmk depositions
5/13/2014	Susan Joseph	2	Discovery review, index and summary.
5/15/2014	Leslie H. Joyner	3.33	Meet and confer re written discovery
5/16/2014	Leslie H. Joyner	0.5	Add PMK info to meet and confer letter
5/16/2014	Leslie H. Joyner	0.5	Draft status report re stay in 9th circuit
5/29/2014	Susan Joseph	0.25	Communications
6/4/2014	Leslie H. Joyner	0.25	Finalize and send Meet and confer letter
6/9/2014	Susan Joseph	0.75	Communications
6/9/2014	Susan Joseph	2	Deposition review
6/10/2014	Susan Joseph	2	Deposition review
6/12/2014	Susan Joseph	4	Deposition preparation and review.
6/16/2014	Susan Joseph	0.25	Comunciations.
6/17/2014	Christina A. Humphrey	14	Fly to Phoenix to take deposition of PMK Ruchensky; take depo and return travel to L.A.
6/17/2014	Susan Joseph	7	Participate in Deposition via Telephone from office.
6/19/2014	Susan Joseph	0.3	Communications
6/23/2014	Susan Joseph	1	Communications; deposition review.
6/24/2014	Christina A. Humphrey	8.5	Travel to downtown L.A. for Deposition of 30b6 Arnold - tasks and duties of class members; return travel to office
6/24/2014	Susan Joseph	0.5	Case management meeting with attorney.
6/24/2014	Susan Joseph	3.5	Research experts

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MARLIN SALTZMAN : Attorney Hours

6/26/2014	Christina A. Humphrey	7.5	Researched Swift/Qualcomm's legal obligation to preserve electronic data, reviewed depo transcript and Omnitracs information to determine whether or not SWift has met its obligation.
6/26/2014	Susan Joseph	0.25	Confer with attorney.
6/27/2014	Christina A. Humphrey	1.2	conference call with data expert Winston Krone re electronic data issues in Swift. Spent 45 minutes sending him documents needed for review/along with emails explaining data and circumstances.
6/27/2014	Susan Joseph	1.5	Confer with Winston Krone (2x)
6/27/2014	Christina A. Humphrey	1.1	conference call with Winston Krone re electronic data preservation and prep for Qualcomm depo.
6/27/2014	Christina A. Humphrey	7.1	prepared for depo of Qualcomm by reviewing prior depo transcript from JB Hunt case, reviewing omni tracs brochures and handouts, formulated outline.
6/27/2014	Stanley D. Saltzman	5.5	Worked with Ms. Humphrey in preparing for critical Omnitracs deposition
6/29/2014	Stanley D. Saltzman	4.5	Work with Ms. Humphrey in final prep for the Omnitracs deponent
6/29/2014	Christina A. Humphrey	6	Final prep for the deposition of the Omnitracs witness
6/30/2014	Susan Joseph	3	Prepare for and review depositions.
6/30/2014	Christina A. Humphrey	11	Drive to San Diego to take Omnitracs witness depo, take the depo and return drive to office in L.A.
6/30/2014	Susan Joseph	3.5	Participate in Omnitracs depo via telephone from the office.
7/1/2014	Susan Joseph	0.25	Communciation.
7/1/2014	Susan Joseph	0.5	Prepare witness packets.
7/3/2014	Susan Joseph	2.5	Prepare witness packets.
7/3/2014	Susan Joseph	2.5	Deposition preparation and review.
7/7/2014	Susan Joseph	0.3	Communciations.
7/8/2014	Susan Joseph	1	Prepare witness packets for deposition.
7/9/2014	Leslie H. Joyner	1	Review Ninth circuit decision in Dilts and order regarding stay. Prepare notice of recent decision.
7/10/2014	Leslie H. Joyner	5.5	legal research on motion to remand in light of Dilts; set up and draft Motion
7/10/2014	Leslie H. Joyner	0.2	Draft email urging defense counsel to stip to remand re dilts
7/25/2014	Leslie H. Joyner	4.5	summary reversal - 9th
7/29/2014	Leslie H. Joyner	4.7	review and summarize current status of discovery due for both parties.
8/5/2014	Susan Joseph	4	Deposition review.
8/20/2014	Susan Joseph	7	Discovery and deposition review.

Swift Transportation Class Action  
MARLIN SALTZMAN : Attorney Hours

8/24/2014	Leslie H. Joyner	8.25	Draft Motion for Summary reversal - 9th Circuit
8/25/2014	Christina A. Humphrey	2.3	reviewed final draft of motion and stipulation to remand.
8/26/2014	Susan Joseph	2	Deposition review and summary; confer with attorney re same.
8/27/2014	Susan Joseph	1.75	Discovery review, index and summary; confer with attorney.
8/27/2014	Christina A. Humphrey	0.2	Reviewed draft of letter re status of retention of written logs. Spoke with Susan about deposition testimony.
8/28/2014	Susan Joseph	1	Review discovery.
9/25/2014	Christina A. Humphrey	1.1	Conference call with Paul Cowie re meet and confer discovery written logs and 30b6 re preservation issues. Case management meeting with Susan and Stan following (.2).
11/13/2014	Susan Joseph	2	Review, index and summarize discovery.
11/25/2014	Christina A. Humphrey	1.8	Reviewed prior PMQ notices, prior emails, Arnold depo, and emailed opposing counsel about lifting stay and new potential dates for PMQ in Arizona.
12/15/2014	Christina A. Humphrey	1.1	call with opposing counsel Paul Cowie re status of case and whether not to remand to trial court for rebriefing of Dilts. Discussed issue with STan.
12/16/2014	Leslie H. Joyner	1.5	draft stip re remand for 9th circuit
1/6/2015	Christina A. Humphrey	2.1	reviewed documents and objections produced pursuant to PMK category nos. 14-22, propounded new PMK depo requests.
2/20/2015	Christina A. Humphrey	0.1	email re opposing counsel re dates for PMK depo.
2/23/2015	Susan Joseph	1.5	Review and summarize deposition.
2/27/2015	Christina A. Humphrey	0.3	reviewed Susan's email summarizing John Arnold's testimony as it pertains to Category No. 9, email Paul Cowie, viewed history of communications as it pertains to PMK depositions.
3/2/2015	Christina A. Humphrey	0.9	met and conferred with opposing counsel re PMK categories and class definition.
3/2/2015	Susan Joseph	2	Depo prep
3/3/2015	Susan Joseph	6	
3/4/2015	Susan Joseph	5.5	
3/5/2015	Leslie H. Joyner	10.5	Travel to Phoenix early morning to take depo of corporate witness Robin Rohwer, and return travel to L.A. same day.
3/10/2015	Susan Joseph	6	Depo Prep
3/10/2015	Stanley D. Saltzman	7	To LAX for flight to Phoenix for depo tomorrow, flight and then travel to Hotel; final prep for depo
3/11/2015	Susan Joseph	7	
3/11/2015	Stanley D. Saltzman	7.5	In Phoenix to take the deposition of corporate witness Sara Koogler, and return flight to L.A.

Swift Transportation Class Action  
MARLIN SALTZMAN : Attorney Hours

3/13/2015	Christina A. Humphrey	8.8	prepared for document preservation deposition by reviewing most recent 2 depositions of Comdata, class list, all emails with defense counsel re preservation, Michael Hine depo and 30b6 on electronic databases.
3/13/2015	Susan Joseph	2	
3/16/2015	Susan Joseph	4	
3/17/2015	Susan Joseph	5.5	
3/18/2015	Christina A. Humphrey	15	Prepared for second session of deposition of Rochensky. Travel to Phoenix AZ, 1 hour conference call with Winston Krone (e-expert), IT expert George, extensive review of Rochensky's first volume of deposition and Michael Hein's deposition.
3/19/2015	Christina A. Humphrey	12.7	Deposition of Rochensky vol. 2, 6.5 hours depo and travel back to Burbank CA from Phoenix AZ.
3/19/2015	Susan Joseph	7.5	
4/6/2015	Susan Joseph	1	
4/9/2015	Christina A. Humphrey	1	email to opposing counsel re deposition of payroll person and meet and confer on various documents/data that has not been produced.
4/17/2015	Susan Joseph	7.5	
4/20/2015	Susan Joseph	2	
4/21/2015	Susan Joseph	2	
4/22/2015	Susan Joseph	1	
4/23/2015	Susan Joseph	1	
4/24/2015	Susan Joseph	3.05	
5/15/2015	Christina A. Humphrey	7.5	Preparation for depo of PMK Malchesky; work with SDS
5/15/2015	Stanley D. Saltzman	5.5	Work with Ms. Humphrey to prepare for the Malchesky depo next Monday in Phoenix.
5/17/2015	Christina A. Humphrey	7	Travel to LAX for flight to Phoenix for Malchesky depo; on to hotel and do final prep for the depo
5/18/2015	Susan Joseph	1.5	Draft PMK notice
5/18/2015	Susan Joseph	0.25	Re PMK Notice, Category 4
5/18/2015	Christina A. Humphrey	8	Take depo of corporate witness Malchesky in Phoenix; return travel to L.A.
6/5/2015	Christina A. Humphrey	1	emailed Paul Cowie to follow up on dates for depo, documents, and proposed dates for depo and reviewed discovery production re meal and rest breaks.
6/5/2015	Susan Joseph	1	
6/8/2015	Christina A. Humphrey	0.2	emailed Paul Cowie re meet and confer dates on deposition and status of case re remand from Ninth Circuit. Checked dates for deposition.

Swift Transportation Class Action  
MARLIN SALTZMAN : Attorney Hours

6/12/2015	Susan Joseph	6	
6/16/2015	Susan Joseph	1	
6/16/2015	Susan Joseph	1	
6/17/2015	Susan Joseph	7	
6/18/2015	Susan Joseph	3.5	
6/18/2015	Susan Joseph	3.5	
6/18/2015	Christina A. Humphrey	4	reviewed data in preparation for deposition of compensation PMK.
6/19/2015	Susan Joseph	2.5	
6/19/2015	Susan Joseph	1	
6/22/2015	Susan Joseph	4.25	
6/22/2015	Christina A. Humphrey	1.1	meeting with STan and Susan to review documents pulled in preparation for deposition PMQ 4 comopensation.
6/22/2015	Stanley D. Saltzman	7	travel to Phoenix Arizona and preparation for deposition of PMQ 4 compensation structure of drivers.
6/23/2015	Christina A. Humphrey	0.2	emailed Paul Cowie re issues Saucillo and docs for deposition.
6/23/2015	Stanley D. Saltzman	12	Depo of PMK James Fitzsimmons in Phoenix; return travel to L.A. and then on to home.
7/13/2015	Susan Joseph	3	Prepare witness packets
7/13/2015	Christina A. Humphrey	6.2	Travel to San diego for deposition, prepare for deposition by preparing outline, reviewing documents including driver manuals, payroll records, and prior deposition transcripts.
7/14/2015	Susan Joseph	0.5	
7/14/2015	Susan Joseph	0.5	
7/14/2015	Christina A. Humphrey	6.5	Deposition of Carlos Pinero, met and conferred with counsel over numerous issues, travelled back from San Diego.
8/12/2015	Susan Joseph	0.5	
8/31/2015	Susan Joseph	0.3	
9/17/2015	Susan Joseph	0.5	
10/1/2015	Christina A. Humphrey	0.5	drafted status conference statement.
10/2/2015	Christina A. Humphrey	0.5	spoke to Paul Cowie re case and finalized CMC statement.
10/5/2015	Christina A. Humphrey	5	travelled to Riverside and attended case management conference with Court.
10/5/2015	Stanley D. Saltzman	5	travelled to Riverside and attended case management conference with Court.

Swift Transportation Class Action  
MARLIN SALTZMAN : Attorney Hours

10/13/2015	Christina A. Humphrey	1	EDD hearing and meet and confer opposing counsel re Gilbert Saucillo.
10/22/2015	Susan Joseph	1	
10/23/2015	Christina A. Humphrey	0.5	met and conferred with Paul Cowie re meal and rest break PMQ.
10/26/2015	Susan Joseph	3.5	
10/26/2015	Christina A. Humphrey	0.3	reviewed letter from Paul Cowie re Burnell and Saucillo discovery responses and met with Susan re supplementing.
10/27/2015	Susan Joseph	0.5	
10/27/2015	Susan Joseph	0.5	
10/28/2015	Susan Joseph	6.5	Data review
10/29/2015	Susan Joseph	7.5	Data reiew; confer with Christina Humphrey re same
10/30/2015	Christina A. Humphrey	1.3	reviewed prior discovery propounded as to meal and rest breaks, prior meet and confer letters, and drafted meet and confer letter to opposing counsel.
10/30/2015	Christina A. Humphrey	1.1	drafted meet and confer email re burnell and saucillo's prior discovery responses.
11/2/2015	Susan Joseph	2.75	
11/2/2015	Christina A. Humphrey	1.2	drafted meet and confer letter re electronic discovery.
11/2/2015	Christina A. Humphrey	0.5	drafted emails confirming deposiiton availability, and meeting and conferring re meal and rest break pmq.
11/3/2015	Susan Joseph	0.2	Telephone conference with expert
11/3/2015	Susan Joseph	3	Data review
11/4/2015	Susan Joseph	0.5	Draft PMK notice
11/9/2015	Susan Joseph	3	Data and discovery review; meet with Christina Humphrey re same; telephone conference re same; draft transmittal letter re release
11/9/2015	Christina A. Humphrey	2.1	reviewed discovery responses, supplemental discovery, spoke to John Burnell, and Gilbert Saucillo regarding additional docs, met with Susan Joseph.
11/10/2015	Susan Joseph	5	
11/15/2015	Christina A. Humphrey	0.3	prepared Gilbert Saucillo for EDD hearing.
11/16/2015	Susan Joseph	7	Document review and depo prep
11/17/2015	Christina A. Humphrey	8.9	prepared for meal and rest break PMQ, reviewed docs and policies produced, as well as Brinker and meal and rest break cases.
11/18/2015	Christina A. Humphrey	6.1	PMQ deposition meal and rest breaks in Phoenix, AZ. Travel back.
11/25/2015	Christina A. Humphrey	2.1	drafted PMQ re rest of meal and rest break issues; meet and confer re remaining discovery, email to Ron Holland re status of depos.

Swift Transportation Class Action  
MARLIN SALTZMAN : Attorney Hours

12/2/2015	Susan Joseph	2.6	prepared for and attended EDD hearing with Plaintiff Saucillo.
12/4/2015	Susan Joseph	0.25	Telephone conference with expert re data formatting
12/4/2015	Susan Joseph	1	
12/7/2015	Christina A. Humphrey	10.5	reviewed Burnell's documents, reviewed data, and met with Burnell to discuss deposition for next day.
12/7/2015	Stanley D. Saltzman	10	Join Ms. Humphrey and client Burnell for full day of prep for his depo the next day.
12/8/2015	Christina A. Humphrey	14	Defended deposition of John Burnell in Costa Mesa (9:30 - 7 pm) and travelled back to Agoura Hills from OC.
12/8/2015	Stanley D. Saltzman	6	Conduct initial meeting with Saucillo in prep for his depo next week.
12/13/2015	Christina A. Humphrey	2.7	reviewed deposition of John Burnell and prepped for Saucillo's deposition.
12/14/2015	Susan Joseph	5	
12/14/2015	Stanley D. Saltzman	8.5	Drive downtown to meet with client for his pre-depo meeting, conduct meeting, and drive back to office.
12/15/2015	Stanley D. Saltzman	9	Drive downtown for depo of client Saucillo, defend his depo and return to office in AH
12/16/2015	Christina A. Humphrey	1	met and conferred re electronic discovery and docs to be produced.
12/21/2015	Susan Joseph	3	
12/24/2015	Leslie H. Joyner	4.5	Drafting
12/26/2015	Christina A. Humphrey	2.7	Reviewed John Burnells' depo transcript with Stan saltzman re Burnell's docs produced, reviewed email explaining doc production, reviewed logs produced.
12/26/2015	Stanley D. Saltzman	2.7	Extensive meeting with Ms. Humphrey to go over the Burnell document production issues that came up at his depo, and how to handle them.
1/4/2016	Christina A. Humphrey	3	Created declarant outline and met with Stan, Tina, Leslie, Susan about strategy re declarations and discuss.
1/4/2016	Susan Joseph	0.5	
1/4/2016	Susan Joseph	7	
1/4/2016	Stanley D. Saltzman	3	Team meeting regarding handling of anticipated decs of class members in support of certification motion, and review of likely candidates.
1/4/2016	Stanley D. Saltzman	4.5	Extensive review of all summaries of many dozens of putative class member interviews, to begin selecting the hoped for declarants. (partial)
1/5/2016	Susan Joseph	3.5	
1/5/2016	Susan Joseph	3.5	
1/5/2016	Stanley D. Saltzman	5	Continue declarant selection process in conjunction with Ms. Joseph
1/6/2016	Christina A. Humphrey	10	prepared for deposition by reviewing qualcomm data, prior qualcomm deposition, trip plan data, qtracs software guide, and prior deposition testimony re electronic data.

Swift Transportation Class Action  
MARLIN SALTZMAN : Attorney Hours

1/6/2016	Susan Joseph	0.5	
1/6/2016	Christina A. Humphrey	2.2	reviewed deposition of Victor Malchesky in preparation for PMQ Meal and Rest break categories 25 and 26.
1/6/2016	Christina A. Humphrey	6.5	Travel to Phoenix for depo of PMK Hessler, and finish prep for the depo
1/6/2016	Stanley D. Saltzman	4.5	Work with Ms. Humphrey and Ms. Joseph in prepping for depo of Hessler tomorrow in Phoenix
1/7/2016	Christina A. Humphrey	12	deposition of PMQ trip plans and PMQ qualcomm messaging data, travel back to LA from Phoenix.
1/7/2016	Susan Joseph	3	
1/7/2016	Susan Joseph	4.5	
1/8/2016	Susan Joseph	5.5	
1/10/2016	Christina A. Humphrey	6.3	reviewed depositions of Hessler, Malchesky, and Ruchensky, summarized points in support of class cert re meal and rest breaks, damages.
1/10/2016	Stanley D. Saltzman	5.5	Work with Ms. Humphrey re PMK deposition review to cull out relevant testimony for class cert motion.
1/11/2016	Leslie H. Joyner	11.5	Motion work - Class Certification
1/11/2016	Susan Joseph	6	
1/11/2016	Stanley D. Saltzman	7.5	Assist with Motion Work - Class Certification
1/12/2016	Leslie H. Joyner	12	Continue Motion Work - Class Certification
1/12/2016	Susan Joseph	8.25	
1/13/2016	Leslie H. Joyner	11	Continue Motion Work - Class Certification
1/13/2016	Susan Joseph	8	
1/13/2016	Stanley D. Saltzman	8.5	Assist with Motion Work - Class Certification
1/14/2016	Leslie H. Joyner	9	Assist with Motion Work - Class Certification
1/14/2016	Susan Joseph	11	
1/14/2016	Christina A. Humphrey	11	Assist with Motion Work - Class Certification
1/14/2016	Marcus J. Bradley	5.5	Editing and reviewing of the certification motion and review some of the declarations.
1/15/2016	Leslie H. Joyner	9	
1/15/2016	Susan Joseph	9	Assist with Motion Work - Class Certification
1/15/2016	Stanley D. Saltzman	9	Assist with Motion Work - Class Certification
1/16/2016	Susan Joseph	8.5	
1/18/2016	Susan Joseph	6.5	



Swift Transportation Class Action  
MARLIN SALTZMAN : Attorney Hours

1/18/2016	Leslie H. Joyner	5	
1/19/2016	Susan Joseph	11	
1/19/2016	Leslie H. Joyner	11.5	Assist with Motion Work - Class Certification
1/19/2016	Stanley D. Saltzman	5.8	Touch base with class members. Prepare drafts of decs.
1/19/2016	Christina A. Humphrey	8.8	Worked on cert brief; edited 3 class member declarations and 2 rep plaintiff declarations.
1/20/2016	Christina A. Humphrey	8.2	Assist with Motion Drafting - Class Certification; also interviewed additional class members. Work on declarations
1/20/2016	Susan Joseph	6	Assist with Motion Work - Class Certification; worked on decs and damages issues
1/20/2016	Leslie H. Joyner	12	Assist with Motion Work - Class Certification, and research of further cases.
1/20/2016	Stanley D. Saltzman	8.5	Assist with Motion Work - Class Certification; Finalize Decs for class cert from class members.
1/21/2016	Stanley D. Saltzman	7.5	Assist with Motion Work - Class Certification
1/21/2016	Marcus J. Bradley	9	Entire day working on editing draft of motion for cert.
1/21/2016	Susan Joseph	10	Assist with Motion Work - Class Certification
1/21/2016	Leslie H. Joyner	6.5	Assist with Motion Work - Class Certification
1/21/2016	Christina A. Humphrey	6.8	edited class certificaion motion.
1/22/2016	Susan Joseph	7.75	
1/22/2016	Leslie H. Joyner	7.5	
1/22/2016	Christina A. Humphrey	5.4	Edited and reviewed adequacy dec, notice of motion, proposed order, and P & As.
1/25/2016	Susan Joseph	2	
2/5/2016	Susan Joseph	1	
2/10/2016	Stanley D. Saltzman	9.5	Travel to and defend session 2 of Saucillo depo, and return drive to Agoura Hills.
2/16/2016	Susan Joseph	4	
2/21/2016	Christina A. Humphrey	0.3	reviewed and revised stip to dismiss 3rd and 5th causes of action, emailed opposing counsel.
3/24/2016	Susan Joseph	1.25	Data analysis; meeting with attorneys re same
3/29/2016	Susan Joseph	0.75	
4/1/2016	Leslie H. Joyner	9.5	Reply
4/1/2016	Stanley D. Saltzman	5.5	Review and analysis of D's opp to the cert motion; frame issues for Reply brief.
4/2/2016	Leslie H. Joyner	11	Review Reply re. Cert; analyse issues; meet with Mr. Saltzman

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MARLIN SALTZMAN : Attorney Hours

4/3/2016	Leslie H. Joyner	10	Begin outlining Reply brief; consult with Mr. Saltzman
4/3/2016	Stanley D. Saltzman	7.5	Further study of Reply brief issues; work with Ms. Joyner
4/4/2016	Leslie H. Joyner	16	reply
4/4/2016	David C. Leimbach	11	Drafting of extensive responses to D's objections to Plaintiffs' evidence in support of the motion to certify. (partial)
4/5/2016	Leslie H. Joyner	12	reply
4/5/2016	Susan Joseph	9	
4/5/2016	Christina A. Humphrey	12	Drafted sections of the Reply brief and edited other sections drafted by Saltzman and Joyner.
4/5/2016	Stanley D. Saltzman	12	Edited portions of the brief; and worked on major revisions to bring the extensive brief within page limits in preparation for filing.
4/5/2016	David C. Leimbach	12	Continue preparation of extensive responses to D's objections to our evidence re. Cert
4/6/2016	Leslie H. Joyner	7.5	Reply
4/6/2016	Susan Joseph	9	Assist with working up details needed for the Reply brief.
4/6/2016	David C. Leimbach	6.5	Completion of the responses to evidentiary objections; prepare in final edited form per Court rules.
4/6/2016	Stanley D. Saltzman	6.5	Worked with team on finalizing all aspects of the Reply brief and overall submission.
4/6/2016	Stanley D. Saltzman	5.5	Morning and afternoon helping get all portions of the Reply papers completed, and ready for filing.
4/14/2016	Susan Joseph	2	
4/14/2016	Christina A. Humphrey	0.3	met and conferred with John Ellis re documents filed under seal.
4/15/2016	Christina A. Humphrey	0.3	meet and confer re application to file under seal with opposing counsel.
4/19/2016	Christina A. Humphrey	0.4	meet and confer re motion to file under seal with opposing counsel, drafted email.
4/20/2016	Susan Joseph	3	Assist with class certification motion.
4/23/2016	Christina A. Humphrey	12	Prepared for motion for class certification hearing.
4/23/2016	Stanley D. Saltzman	10	Assist with initial day of preparation for upcoming cert hearing.
4/23/2016	Stanley D. Saltzman	8.5	Participate in mediation with Mr. Rudy
4/24/2016	Christina A. Humphrey	12	Continued preparation for motion for class certification hearing.
4/24/2016	Stanley D. Saltzman	10	Continued prep for cert hearing.
4/24/2016	Leslie H. Joyner	12	Assist partners in preparing for certification hearing.
4/25/2016	Christina A. Humphrey	5.8	Travelled to Los Angeles, attended and argued motion for class certification.
4/25/2016	Christina A. Humphrey	5	prepared for motion for class certification.

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MARLIN SALTZMAN : Attorney Hours

4/25/2016	Stanley D. Saltzman	10	Morning prep for, and travel downtown for afternoon cert hearing.
4/25/2016	Leslie H. Joyner	6	Attend and assist partner Christina Humphrey at cert hearing.
5/4/2016	David C. Leimbach	9.1	Meeting with team re denial of cert, and begin working on research regarding the 23f Appellate petition
5/4/2016	Stanley D. Saltzman	3.5	Review order denying motion to certify; meeting with team to go over appellate review issues
5/4/2016	Christina A. Humphrey	3.5	Review denial of cert order and meet regarding approach to appeal via 23f.
5/5/2016	David C. Leimbach	10.5	Further research re the Swift Appellate Brief
5/6/2016	David C. Leimbach	8.7	Commence drafting of the Swift Appellate Brief
5/6/2016	Stanley D. Saltzman	7.5	Assist Mr. Leimbach with the drafting of the 23f petition.
5/7/2016	David C. Leimbach	8.3	Continued drafting of the Swift Appellate Brief
5/8/2016	David C. Leimbach	10	Continued drafting of the Swift Appellate Brief
5/8/2016	Stanley D. Saltzman	7.5	Review portions of the appellate brief already written, and edit some and suggest edits to other portions.
5/9/2016	David C. Leimbach	9	Draft Swift Appellate Brief
5/10/2016	David C. Leimbach	8.6	Draft Swift Appellate Brief
5/11/2016	David C. Leimbach	8.3	Draft Swift Appellate Brief
5/12/2016	David C. Leimbach	10.2	Draft Swift Appellate Brief
5/13/2016	David C. Leimbach	11.4	Draft Swift Appellate Brief
5/13/2016	Stanley D. Saltzman	8.3	Review and edit updated draft of the 23f petition
5/14/2016	David C. Leimbach	10.7	Further work on drafting of Swift Appellate Brief
5/17/2016	David C. Leimbach	6.8	edit and finalize appellate brief
5/20/2016	David C. Leimbach	10.4	Draft appellate reply brief; and extended meeting with Mr. Saltzman regarding presenation of a couple of the issues.
5/20/2016	Stanley D. Saltzman	9	Further review of newly updated draft of 23f petition; prepare edits and discuss all issues again with Mr. Leimbach.
5/21/2016	David C. Leimbach	9.6	Draft appellate reply brief
5/22/2016	David C. Leimbach	8.8	Draft appellate reply brief
5/22/2016	Stanley D. Saltzman	5	Review and revise current version of the 23f petition.
5/23/2016	David C. Leimbach	8.5	Draft appellate reply brief
5/24/2016	David C. Leimbach	8.9	Draft appellate reply brief
5/25/2016	David C. Leimbach	11.6	Edit and later finalize swift appellate brief for filing with the 9th Circuit.

Swift Transportation Class Action  
MARLIN SALTZMAN : Attorney Hours

5/25/2016	Stanley D. Saltzman	7.5	Work with Mr. Leimbach with final editing of the 23f petition. Approve for filing.
2/15/2017	Stanley D. Saltzman	1.9	Conference call with co-counsel in Rudsell regarding possible mediation
12/18/2017	Stanley D. Saltzman	3.4	Work up various issues regarding mediation
4/10/2018	Stanley D. Saltzman	5.5	Discussions re. mediation, approach to same, and review data and damage workups.
4/17/2018	Stanley D. Saltzman	7.5	Review of extensive data re. damage issues for mediation. Confer with Mr. Mauro
4/21/2018	Stanley D. Saltzman	8.5	Entire day working on mediation issues.
4/22/2018	Stanley D. Saltzman	0.8	Telecon with Mr. Rudy regarding mediation
5/30/2018	Stanley D. Saltzman	1.5	Confer regarding mediation follow up issues; still negotiating
5/14/2019	Stanley D. Saltzman	8.5	Drafting of preliminary approval motion (beginning, and partial)
6/1/2019	Stanley D. Saltzman	10	Further extensive work on motion for approval, and declaration in support thereof.
6/3/2019	Stanley D. Saltzman	4.5	Review motion redlines from co-counsel; and discuss other issues to address
6/23/2019	Stanley D. Saltzman	1.5	Confer with all counsel regarding objection issues.
6/24/2019	Stanley D. Saltzman	2.4	Work on edits to objection response.
8/12/2019	Stanley D. Saltzman	5.5	Appear downtown for hearing on preliminary approval
11/16/2019	Stanley D. Saltzman	6.5	Work on final approval motion and declarations of SDS and client.
11/18/2019	Stanley D. Saltzman	7	Work on all issues re finalizing the final approval motion and supporting papers.
<b>TOTAL</b>		<b>2,513.21</b>	

## **EXHIBIT 2**

# **EXHIBIT 2**

**to Declaration of Stanley D. Saltzman**

11/18/2019  
9:45 AMMarlin & Saltzman, LLP  
Pre-bill Worksheet

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## Selection Criteria

Clie.Selection Include: 22-4212  
 Atto.Selection Include: Joy  
 Slip.Transaction Date Earliest - 11/18/2019

Nickname 22-4212 | Burnell  
 Full Name Burnell v Swift Transportation  
 Address  
 Phone 1 Phone 2  
 Phone 3 Phone 4  
 In Ref To **Burnell** v Swift Transportation  
 Our Case # 22-4212  
 Fees Arrg. By billing value on each slip  
 Expense Arrg. By billing value on each slip  
 Tax Profile Exempt

Total of billable time slips \$0.00

Date ID	Attorney Expense	Price Markup %	Quantity	Amount	Total
8/21/2012	Joy 170961 \$Expenses Expense re ABC Legal; Invoice 7520304; Deliver courtesy copy to court	79.50	1.000	79.50	Billable
8/27/2012	Joy 170962 \$Expenses Expense re ABC Legal; Invoice 7520336; Deliver courtesy copy to court	63.50	1.000	63.50	Billable
8/31/2012	Joy 170723 \$Photocopies August, 2012 copy charges; 214 copies @ .10 per copy	0.10	214.000	21.40	Billable
9/19/2012	Joy 170863 \$Expenses Expense re Ace Attorney Service; Invoice 105401; Delivery to <b>USDC-Riverside</b>	44.00	1.000	44.00	Billable
11/30/2012	Joy 171712 \$Photocopies November, 2012 copy charges; 48 copies @ .10 per copy	0.10	48.000	4.80	Billable
12/31/2012	Joy 171955 \$Postage December, 2012 Postage charges. charges	4.40	1.000	4.40	Billable
12/31/2012	Joy 172174 \$Photocopies December, 2012 copy charges; 937 copies @ .10 per copy	0.10	937.000	93.70	Billable

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Date ID	Attorney Expense	Price Markup %	Quantity	Amount	Total
1/21/2013 171968	Joy \$Expenses Expense re LA Court Online; Invoice 1130121J2300; copies	15.00	1.000	15.00	Billable
1/31/2013 172328	Joy \$Postage January, 2013 Postage charges.	1.90	1.000	1.90	Billable
2/28/2013 172441	Joy \$Photocopies February, 2013 copy charges; 119 copies @ .10 per copy	0.10	119.000	11.90	Billable
2/28/2013 172572	Joy \$Postage February, 2013 Postage charges.	11.94	1.000	11.94	Billable
3/7/2013 173666	Joy \$Expenses Expense re ABC Legal; Invoice 7764142; Courtesy copies to court	79.50	1.000	79.50	Billable
3/31/2013 173007	Joy \$Photocopies March, 2012 copy charges; 44 copies @ .10 per copy	0.10	44.000	4.40	Billable
3/31/2013 173264	Joy \$Postage March, 2013 Postage charges.	4.76	1.000	4.76	Billable
3/31/2013 173274	Joy \$Postage March, 2012 Postage charges. (mailing of pre-certification notice)	2122.90	1.000	2,122.90	Billable
4/23/2013 174246	Joy \$Expenses Expense re ABC Legal; Invoice 7743020; deliver copies to court	204.50	1.000	204.50	Billable
4/30/2013 173243	Joy \$Postage April Postage charges.	487.16	1.000	487.16	Billable
5/31/2013 173803	Joy \$Postage May, 2013 Postage charges.	1.32	1.000	1.32	Billable
6/18/2013 174428	Joy \$FedEx Federal Express charges to Judge Phillips, United States District Court, Riverside, California	21.58	1.000	21.58	Billable



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Date ID	Attorney Expense	Price Markup %	Quantity	Amount	Total
6/30/2013	Joy	0.10	76.000	7.60	Billable
173598	\$Photocopies June, 2013 copy charges; 76 copies @ .10 per copy				
7/16/2013	Joy	87.50	1.000	87.50	Billable
174738	\$Expenses Expense re ABC Legal; Invoice 7958299; courtesy copy to court				
7/18/2013	Joy	135.50	1.000	135.50	Billable
174741	\$Expenses Expense re ABC Legal; Invoice 7958310; deliver courtesy copies to court				
7/23/2013	Joy	69.50	1.000	69.50	Billable
174743	\$Expenses Expense re ABC Legal; Invoice 7958346; Deliver courtesy copies to court				
8/7/2013	Joy	110.50	1.000	110.50	Billable
175078	\$Expenses Expense re ABC Legal; invoice 7935011; deliver courtesy copies to court				
8/13/2013	Joy	83.50	1.000	83.50	Billable
175082	\$Expenses Expense re ABC Legal; Invoice 22-4212; courtesy copies to court				
8/21/2013	Joy	103.50	1.000	103.50	Billable
175087	\$Expenses Expense re ABC Legal; Invoice 7967176; courtesy copies to court				
8/28/2013	Joy	79.50	1.000	79.50	Billable
175090	\$Expenses Expense re ABC Legal; Invoice 7967227; file second Amended Complaint				
9/17/2013	Joy	455.00	1.000	455.00	Billable
175317	\$Expenses Expense re filing Notice of Appeal				
9/30/2013	Joy	15.67	1.000	15.67	Billable
174916	\$Postage September, 2013 Postage charges.				
9/30/2013	Joy	0.10	340.000	34.00	Billable
174959	\$Photocopies September, 2013 copy charges; 340 copies @ .10 per copy				
10/7/2013	Joy	80.64	1.000	80.64	Billable
175305	\$Expenses Expense re Phyllis Preston; Transcript of 5/13/13 hearing for appeal				

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Date ID	Attorney Expense	Price Markup %	Quantity	Amount	Total
10/8/2013	Joy 175152 \$FedEx Federal Express charges to Phyllis Preston, United States District Court, Riverside, CA	21.88	1.000	21.88	Billable
10/10/2013	Joy 175301 \$Delivery Delivery Cost to Ace Attorney Service; Invoice 121023; Delivery to Saucillo Swift, San Francisco, CA	83.63	1.000	83.63	Billable
10/10/2013	Joy 176660 \$Expenses Expense re ABC Legal; Invoice 7934555; Certified copy of Docket	36.00	1.000	36.00	Billable
10/31/2013	Joy 175275 \$Postage October, 2013 Postage charges.	2.84	1.000	2.84	Billable
12/10/2013	Joy 176097 \$Parking Parking re court appearance; C. Humphrey	34.50	1.000	34.50	Billable
1/6/2014	Joy 175977 \$FedEx Federal Express charges to Ronald Holland, San Francisco, CA	45.17	1.000	45.17	Billable
1/31/2014	Joy 176392 \$Postage January, 2014 postage charges	46.56	1.000	46.56	Billable
5/1/2014	Joy 177476 \$Expenses Expense re Custodian of Records; Witness fee and mileage for deposition	46.16	1.000	46.16	Billable
5/31/2014	Joy 177615 \$Expenses Expense re May, 2014 postage charges	6.42	1.000	6.42	Billable
5/31/2014	Joy 177718 \$Photocopies May, 2014 copy charges; 470 copies @ .10 per copy	0.10	470.000	47.00	Billable
6/12/2014	Joy 178066 \$Mileage Mileage re; travel to and from Burbank airport for flight to Phoenix, AZ for depositions; C. Humphrey; 60 miles @ .565 per mile	0.565	60.000	33.90	Billable

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Date ID	Attorney Expense	Price Markup %	Quantity	Amount	Total
6/12/2014	Joy 178277 \$Travel Travel expense re Southwest Airlines; travel to Phoenix for depositions; C. Humphrey	494.00	1.000	494.00	Billable
6/17/2014	Joy 178279 \$Expenses Expense re taxi service while in Phoenix, AZ for depositions; C. Humphrey	117.54	1.000	117.54	Billable
6/18/2014	Joy 178281 \$Parking Parking re Bob Hope Airport; parking while in Phoenix for depositions; C. Humphrey	46.00	1.000	46.00	Billable
6/19/2014	Joy 178278 \$Hotel Hotel expenses re Sheraton, Phoenix, AZ; C. Humphrey; depositions	509.69	1.000	509.69	Billable
6/24/2014	Joy 178067 \$Mileage Mileage re; travel to Los Angeles for deposition; C. Humphrey; 70 miles @ .565 per mile	0.565	70.000	39.55	Billable
6/24/2014	Joy 178282 \$Parking Parking re deposition in Los Angeles; C. Humphrey	40.00	1.000	40.00	Billable
6/30/2014	Joy 177854 \$Photocopies June, 2014 copy charges; 1731 copies @ .10 per copy	0.10	1731.000	173.10	Billable
7/1/2014	Joy 178068 \$Mileage Mileage re; travel to La Jolla for deposition; C. Humphrey; 320 miles @ .565 per mile	0.565	320.000	180.80	Billable
7/1/2014	Joy 178284 \$Hotel Hotel expenses re Hilton Hotels, La Jolla, CA; deposition; C. Humphrey	342.16	1.000	342.16	Billable
7/9/2014	Joy 177984 \$Depositions Deposition Costs re LegaLink; Invoice 17192041; certified copy of transcript; deposition of John M. Arnold, PMK and Individually on June 24, 2014	1135.10	1.000	1,135.10	Billable

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Date ID	Attorney Expense	Price Markup %	Quantity	Amount	Total
7/9/2014 177985	Joy \$Depositions Deposition Costs re <b>Legalink</b> ; Invoice 17191839; Videotaping services for the deposition of Michael <b>Ruchensky</b> on June 17, 2014	1147.50	1.000	1,147.50	Billable
7/14/2014 177955	Joy \$Depositions Deposition Costs re <b>Legalink</b> ; Invoice 17191840; Videotaping services for the deposition of John Arnold on June 24, 2014	873.75	1.000	873.75	Billable
7/14/2014 178219	Joy \$Expenses Expense re ABC Legal; Invoice 30212824; serve discovery on opposing counsel	99.50	1.000	99.50	Billable
7/16/2014 177962	Joy \$Depositions Deposition Costs re <b>Legalink</b> ; Invoice 17191810; Copy of transcript of deposition. Michael Kevin <b>Ruchensky</b> on June 17, 2014	1547.74	1.000	1,547.74	Billable
7/16/2014 177963	Joy \$Depositions Deposition Costs re <b>Legalink</b> ; Invoice 17192286; Copy of transcript of deposition; Michael <b>Hein</b> , Corporate Designee on June 30, 2014	988.85	1.000	988.85	Billable
7/31/2014 178211	Joy \$Photocopies July, 2014 copy charges; 82 copies @ .10 per copy	0.10	82.000	8.20	Billable
7/31/2014 178252	Joy \$Postage July, 2014 postage charges	5.04	1.000	5.04	Billable
8/7/2014 178094	Joy \$Expenses Expense re <b>Kivu</b> Consulting; Invoice 2010440; Consulting services re review of documentation, telephone calls with counsel, review of <b>PMK</b> notice and RFP	1575.00	1.000	1,575.00	Billable
9/30/2014 178810	Joy \$Photocopies September, 2014 copy charges; 54 copies @ .10 per copy	0.10	54.000	5.40	Billable
10/31/2014 179364	Joy \$Photocopies October, 2014 copy charges; 55 copies @ .10 per copy	0.10	55.000	5.50	Billable

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Date ID	Attorney Expense	Price Markup %	Quantity	Amount	Total
10/31/2014	Joy 179419 \$Postage October, 2014 postage charges	4.83	1.000	4.83	Billable
1/15/2015	Joy 180059 \$Expenses Expense re Integrity Legal; Invoice 131752; 3,641 medium litigation copies, ring binders, custom tabs	624.55	1.000	624.55	Billable
1/31/2015	Joy 180241 \$Postage January, 2015 postage charges	5.46	1.000	5.46	Billable
1/31/2015	Joy 180308 \$Photocopies January, 2015 copy charges; 283 copies @ .10 per copy	0.10	283.000	28.30	Billable
2/28/2015	Joy 180572 \$Photocopies February, 2014 copy charges; 208 copies @ .10 per copy	0.10	208.000	20.80	Billable
2/28/2015	Joy 180580 \$Photocopies February, 2014 copy charges; 200 copies @ .10 per copy	0.10	200.000	20.00	Billable
3/4/2015	Joy 180789 \$Travel Travel expense re Southwest Airlines; travel to Phoenix for deposition; L. Joyner	504.20	1.000	504.20	Billable
3/4/2015	Joy 180790 \$Travel Travel expense re cab fare in Phoenix for deposition; L. Joyner	60.53	1.000	60.53	Billable
3/5/2015	Joy 180791 \$Parking Parking re Burbank Airport; for trip to Phoenix for deposition; L. Joyner	46.00	1.000	46.00	Billable
3/5/2015	Joy 180792 \$Expenses Expense re cab fare in Phoenix for deposition; L. Joyner	33.02	1.000	33.02	Billable
3/6/2015	Joy 180794 \$Hotel Hotel expenses re Hilton Hotel, Phoenix; L. Joyner; deposition	388.02	1.000	388.02	Billable



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Date ID	Attorney Expense	Price Markup %	Quantity	Amount	Total
3/16/2015	Joy 181558 \$Mileage Mileage re; travel to and from Burbank Airport; C. Humphrey; 56 miles @ .575 per mile	0.575	56.000	32.20	Billable
3/26/2015	Joy 180648 \$Depositions Deposition Costs re Legalink; Invoice 1838804; transcript of deposition of Robin Rohwer on March 5, 2015	584.56	1.000	584.56	Billable
3/31/2015	Joy 180855 \$Depositions Deposition Costs re Legalink; Invoice 1841949; Videography of deposition of Sarah Lynn Koogle on March 11, 2015	628.33	1.000	628.33	Billable
3/31/2015	Joy 180921 \$Postage March, 2015 postage charges	3.57	1.000	3.57	Billable
3/31/2015	Joy 180941 \$Photocopies March, 2015 copy charges; 640 copies @ .10 per copy	0.10	640.000	64.00	Billable
3/31/2015	Joy 180956 \$Photocopies March, 2015 copy charges; 878 copies @ .10 per copy	0.10	878.000	87.80	Billable
3/31/2015	Joy 182118 \$Depositions Deposition Costs re Legalink; Invoice 1841947; Original transcript and CD. Deposition of Sarah Lynn Koogle on March 11, 2015	968.16	1.000	968.16	Billable
3/31/2015	Joy 182119 \$Depositions Deposition Costs re Legalink; Invoice 1847640; Original transcript, CD. Deposition of Michael Ruchensky on March 19, 2015	1574.96	1.000	1,574.96	Billable
3/31/2015	Joy 182120 \$Depositions Deposition Costs re Legalink; Invoice 1848032; Videography; deposition of Robin Rohwer on March 5, 2015	557.08	1.000	557.08	Billable
4/5/2015	Joy 180614 \$Expert Expert fees re Kivu Consulting, Inc; Invoice 2010702; Review documentation	1225.00	1.000	1,225.00	Billable

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Date ID	Attorney Expense	Price Markup %	Quantity	Amount	Total
4/14/2015 184394	Joy \$Travel Travel expense re Southwest Airlines, travel to Phoenix for deposition of PMK; S. Saltzman	526.99	1.000	526.99	Billable
4/14/2015 195714	Joy \$Travel Travel expense re Southwest Airlines, trael to Phoenix for deposition of PMK; C. Humphrey	526.99	1.000	526.99	Billable
4/15/2015 195715	Joy \$Hotel Hotel expenses in San Francisco for deposition of PMK; S. Saltzman	393.75	1.000	393.75	Billable
4/15/2015 195716	Joy \$Hotel Hotel expenses in San Francisco for deposition of PMK; C. Humphrey	375.50	1.000	375.50	Billable
4/16/2015 184395	Joy \$Parking Parking re Bob Hope Airport parking while at deposition of PMK; S. Saltzman	46.00	1.000	46.00	Billable
4/16/2015 184396	Joy \$Parking Parking re Bob Hope Airport for deposition of PMK; C. Humphrey	46.00	1.000	46.00	Billable
4/22/2015 181158	Joy \$Depositions Deposition Costs re Legalink; Invoice 1854602; Videography; deposition of Michael Ruchensky on March 19, 2015	1188.75	1.000	1,188.75	Billable
4/30/2015 181323	Joy \$Photocopies April, 2015 copy charges; 641 copies @ .10 per copy	0.10	641.000	64.10	Billable
4/30/2015 181332	Joy \$Photocopies April, 2015 copy charges; 21 copies @ .10 per copy	0.10	21.000	2.10	Billable
5/31/2015 181681	Joy \$Photocopies May, 2015 copy charges; 19 copies @ .10 per copy	0.10	19.000	1.90	Billable
5/31/2015 181933	Joy \$Postage May, 2015 postage	3.57	1.000	3.57	Billable

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Date ID	Attorney Expense	Price Markup %	Quantity	Amount	Total
6/2/2015 184415	Joy \$Travel Travel expense re Southwest Airlines; travel to Phoenix for depositions; S. Saltzman	530.99	1.000	530.99	Billable
6/2/2015 184416	Joy \$Travel Travel expense re Southwest Airlines; travel to Phoenix for depositions; C. Humphrey	530.99	1.000	530.99	Billable
6/3/2015 184417	Joy \$Travel Travel expense re taxi at airport in Phoenix for depositions; S. Saltzman	46.00	1.000	46.00	Billable
6/3/2015 184418	Joy \$Hotel Hotel expenses re Palomar Hotel, Phoenix; for depositions; S. Saltzman	325.90	1.000	325.90	Billable
6/3/2015 184419	Joy \$Hotel Hotel expenses re Palomar, Phoenix for depositions; C. Humphrey	279.58	1.000	279.58	Billable
6/22/2015 184427	Joy \$Travel Travel expense re Southwest Airlines; travel to Phoenix for Swift's PMK; S. Saltzman	546.99	1.000	546.99	Billable
6/22/2015 184432	Joy \$Travel Taxi to hotel in Phoenix; deposition; S. Saltzman	26.03	1.000	26.03	Billable
6/22/2015 184433	Joy \$Parking Parking re Burbank Airport; parking while in Phoenix for deposition; S. Saltzman	17.72	1.000	17.72	Billable
6/23/2015 184434	Joy \$Travel Travel expense re taxi to airport in Phoenix for deposition; S. Saltzman	10.27	1.000	10.27	Billable
6/23/2015 184436	Joy \$Hotel Hotel expenses re Palomar Hotel, Phoenix, deposition of PMK; S. Saltzman	159.08	1.000	159.08	Billable
6/30/2015 182470	Joy \$Photocopies June copy charges	0.10	536.000	53.60	Billable



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Date ID	Attorney Expense	Price Markup %	Quantity	Amount	Total
7/10/2015	Joy 182205 \$Depositions Deposition Costs re DTI; Invoice 1897672; Original transcript; CD; deposition of James Fitzsimmons on June 23, 2015	1183.14	1.000	1,183.14	Billable
7/13/2015	Joy 182123 \$Mileage Mileage re; travel to San Diego for deposition; C. Humphrey	0.575	320.000	184.00	Billable
7/14/2015	Joy 182955 \$Parking Parking re deposition in San Diego; C. Humphrey	22.75	1.000	22.75	Billable
7/15/2015	Joy 182957 \$Hotel Hotel expenses re Grand Hyatt, San Diego; deposition; C. Humphrey	417.71	1.000	417.71	Billable
7/17/2015	Joy 182447 \$Depositions Deposition Costs re DTI; Invoice 1899018; Videography; deposition of James Fitzsimmons on June 23, 2015	921.25	1.000	921.25	Billable
7/31/2015	Joy 182648 \$Photocopies Copier #2; July copy charges; 2158 copies @ .10 per copy	0.10	2158.000	215.80	Billable
7/31/2015	Joy 182787 \$Depositions Deposition Costs re DTI; Invoice 1901746; Original Transcript; deposition of Carlos Pinero on July 14, 2015	448.75	1.000	448.75	Billable
7/31/2015	Joy 182790 \$Depositions Deposition Costs re DTI; Invoice 1902401; Videography services; deposition of Carlos Pinero on July 14, 2015	574.75	1.000	574.75	Billable
8/18/2015	Joy 184386 \$Travel Travel expense re Southwest Airlines; travel to deposition; S. Saltzman	532.99	1.000	532.99	Billable
8/28/2015	Joy 184387 \$Parking Parking re Bob Hope Airport; for travel to San Francisco for deposition; S. Saltzman	23.00	1.000	23.00	Billable
9/28/2015	Joy 184388 \$Hotel Hotel expenses re Hyatt Hotel, San Francisco; deposition; S. Saltzman	481.78	1.000	481.78	Billable

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Date ID	Attorney Expense	Price Markup %	Quantity	Amount	Total
10/30/2015	Joy 184230 \$Photocopies October copy charges; back copier; 101 copies @ .10 per copy	0.10	101.000	10.10	Billable
10/30/2015	Joy 184294 \$Postage October postage charges	1.94	1.000	1.94	Billable
11/11/2015	Joy 183431 \$FedEx Federal Express charges to Ms. Gilbert Saucillo, Upland, CA	58.57	1.000	58.57	Billable
11/11/2015	Joy 183562 \$FedEx Federal Express charges to John Burnell, Anaheim, CA	63.00	1.000	63.00	Billable
11/12/2015	Joy 184443 \$Expenses Expense re Facebook Campaign; cost	500.00	1.000	500.00	Billable
11/13/2015	Joy 183563 \$FedEx Federal Express charges from John Burnell, Anaheim, CA	55.11	1.000	55.11	Billable
11/16/2015	Joy 183564 \$FedEx Federal Express charges from Gilbert Saucillo, Upland, CA	51.00	1.000	51.00	Billable
11/17/2015	Joy 183676 \$Travel Travel expense re Southwest Airlines; travel to Phoenix for deposition; C. Humphrey	460.98	1.000	460.98	Billable
11/18/2015	Joy 184450 \$Mileage Mileage re; travel to Burbank for flight to Phoenix for deposition; C. Humphrey; 56 miles @ .575 per mile	0.575	56.000	32.20	Billable
11/18/2015	Joy 184480 \$Expenses Expense re taxi to deposition in Phoenix; C. Humphrey	86.69	1.000	86.69	Billable
11/18/2015	Joy 184481 \$Hotel Hotel expenses re Palomar Hotel, Phoenix; deposition; C. Humphrey	427.89	1.000	427.89	Billable

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Date ID	Attorney Expense	Price Markup %	Quantity	Amount	Total
11/19/2015	Joy 183677 \$Travel Travel expense re Southwest Airlines; travel to Burbank from deposition; C. Humphrey	253.98	1.000	253.98	Billable
11/19/2015	Joy 184482 \$Expenses Expense re taxi service to hotel from deposition and to airport; C. Humphrey	159.00	1.000	159.00	Billable
11/30/2015	Joy 184137 \$Postage November postage charges	23.67	1.000	23.67	Billable
11/30/2015	Joy 184171 \$Photocopies November copy charges; back copier; 1513 copies @ .10 per copy	0.10	1513.000	151.30	Billable
11/30/2015	Joy 184195 \$Photocopies November copy charges; front copier; 319 copies @ .10 per copy	0.10	319.000	31.90	Billable
12/8/2015	Joy 184452 \$Mileage Mileage re; travel to Irvine for deposition; C. Humphrey; 150 miles @ .575 per mile	0.575	150.000	86.25	Billable
12/8/2015	Joy 184496 \$Parking Parking re parking in Orange County for deposition; C. Humphrey	20.00	1.000	20.00	Billable
12/10/2015	Joy 183553 \$Depositions Deposition Costs re DTI; Invoice M-035280; Deposition transcript. Deposition of Victor Malchesky on November 18, 2015	731.65	1.000	731.65	Billable
12/11/2015	Joy 184881 \$Hotel Hotel expenses re Hilton Hotel, Costa Mesa; hotel for client John Burnell for depositon	361.78	1.000	361.78	Billable
12/11/2015	Joy 184882 \$Hotel Hotel expenses re Hilton Hotel, Costa Mesa; for deposition; C. Humphrey	358.78	1.000	358.78	Billable
12/14/2015	Joy 183552 \$Depositions Deposition Costs re Barkley Court Reporters; Invoice 485091; Certified copy of transcript; deposition of John Brunell on December 8, 2015	1769.15	1.000	1,769.15	Billable

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Date ID	Attorney Expense	Price Markup %	Quantity	Amount	Total
12/14/2015	Joy 184375 \$Expenses Expense re Gilbert <b>Saucillo</b> ; witness fees and mileage reimbursement	500.00	1.000	500.00	Billable
12/15/2015	Joy 183700 \$Depositions Deposition Costs re <b>DTI; Videography</b> , Deponent Victor <b>Malchesky</b> on November 18, 2015	711.26	1.000	711.26	Billable
12/15/2015	Joy 185413 \$Hotel Hotel expenses re Omni, Los Angeles; hotel for client Mr. <b>Saucillo</b> for his deposition	287.88	1.000	287.88	Billable
12/17/2015	Joy 184332 \$FedEx Federal Express charges to John <b>Burnell</b> , Anaheim, CA	53.59	1.000	53.59	Billable
12/21/2015	Joy 184321 \$Expenses Expense re <b>Barkley</b> Court Reporters; Invoice 485515; Certified transcript; deposition of Gilbert <b>Saucillo</b> on December 15, 2015	1918.54	1.000	1,918.54	Billable
12/24/2015	Joy 184629 \$FedEx Federal Express charges to Gilbert <b>Saucillo</b> , Upland, CA	35.45	1.000	35.45	Billable
12/29/2015	Joy 184631 \$FedEx Federal Express charges from Gilbert <b>Saucillo</b> , Upland, CA	32.35	1.000	32.35	Billable
12/31/2015	Joy 184248 \$Photocopies December copy charges; front copier; 688 copies @ .10 per copy	0.10	688.000	68.80	Billable
12/31/2015	Joy 184265 \$Photocopies December copy charges; back copier; 487 copies @ .10 per copy	0.10	487.000	48.70	Billable
1/5/2016	Joy 184889 \$Expenses Expense re Southwest Airlines; travel to Phoenix for depositions; C. Humphrey	521.96	1.000	521.96	Billable
1/6/2016	Joy 186273 \$Mileage Mileage re; travel to Burbank Airport for flight to Phoenix for depositions; C. <b>Humphrey</b> ; 60 miles @ .575 per mile	0.575	60.000	34.50	Billable



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Date ID	Attorney Expense	Price Markup %	Quantity	Amount	Total
1/7/2016	Joy	1243.75	1.000	1,243.75	Billable
184636	\$Depositions Deposition Costs re <b>DTI</b> ; Invoice <b>M-043875</b> ; Transcripts; depositions of Corey <b>Hessler</b> , Michael <b>Ruchensky</b>				
1/7/2016	Joy	37.21	1.000	37.21	Billable
184662	\$FedEx Federal Express charges from John <b>Burnell</b> to Christina <b>Humphrey</b> , Agoura Hills				
1/7/2016	Joy	40.00	1.000	40.00	Billable
184890	\$Travel Travel expense re taxi service in Phoenix for depositions; C. Humphrey				
1/7/2016	Joy	46.00	1.000	46.00	Billable
184891	\$Parking Parking re Bob Hope Airport while in Phoenix for depositions; C. Humphrey				
1/7/2016	Joy	347.95	1.000	347.95	Billable
184892	\$Hotel Hotel expenses re <b>Palomar</b> Phoenix hotel; for depositions; C. Humphrey				
1/9/2016	Joy	376.87	1.000	376.87	Billable
184893	\$Hotel Hotel expenses re <b>Doubletree</b> Hotel, Los Angeles; for depositions; C. Humphrey				
1/25/2016	Joy	956.60	1.000	956.60	Billable
184634	\$Expenses Expense re <b>DTI</b> ; Invoice <b>M-043961</b> ; transcript; deposition of John Arnold on January 11, 2016				
1/25/2016	Joy	418.13	1.000	418.13	Billable
185973	\$Expenses Expense re Ace Attorney Service; Invoice 165490; chambers copies; 11 documents				
1/31/2016	Joy	0.10	592.000	59.20	Billable
184778	\$Photocopies January copy charges; back copier; 592 copies @ .10 per copy				
1/31/2016	Joy	0.10	235.000	23.50	Billable
184805	\$Photocopies January copy charges; front copier; 235 copies @ .10 per copy				
1/31/2016	Joy	8.57	1.000	8.57	Billable
184834	\$Postage January postage charges				

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Date ID	Attorney Expense	Price Markup %	Quantity	Amount	Total
2/3/2016 184751	Joy \$FedEx Federal Express charges to Gilbert Saucillo, Upland, cA	27.69	1.000	27.69	Billable
2/4/2016 184687	Joy \$FedEx Federal Express charges to Gilbert Saucillo, Upland, CA	29.14	1.000	29.14	Billable
2/5/2016 184691	Joy \$FedEx Federal Express charges from Gilbert Saucillo, Upland, CA	21.93	1.000	21.93	Billable
2/5/2016 185050	Joy \$Expenses Expense re Gilbert Saucillo; witness fee and reimbursement	240.00	1.000	240.00	Billable
2/8/2016 184635	Joy \$Depositions Deposition Costs re DTI; invoice M043962; Transcript; deposition of John Arnold; Videography; on January 11, 2015	507.50	1.000	507.50	Billable
2/9/2016 185399	Joy \$Parking Parking re lunch meeting; pre-deposition; S. Saltzman	22.00	1.000	22.00	Billable
2/10/2016 184905	Joy \$Depositions Deposition Costs re Magna Legal Services; Invoice 249505; certified copy of transcript; deposition of Gilbert Saucillo on February 10, 2016	1525.54	1.000	1,525.54	Billable
2/10/2016 185049	Joy \$Expenses Expense re Gilbert Saucillo, Witness fee and reimbursement	240.00	1.000	240.00	Billable
2/10/2016 185401	Joy \$Parking Parking re deposition; for Mr. Saucillo	41.00	1.000	41.00	Billable
2/10/2016 185402	Joy \$Expenses Expense re parking at deposition; S. Saltzman	41.00	1.000	41.00	Billable
2/10/2016 185403	Joy \$Hotel Hotel expenses re Millennium Biltmore; hotel for Mr. Saucillo at his deposition	396.27	1.000	396.27	Billable

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Date ID	Attorney Expense	Price Markup %	Quantity	Amount	Total
2/10/2016 188457	Joy \$Expenses Expense re Magna Legal Service; Invoice 251480; Video services; deposition of Gilbert Saucillo on February 10, 2016	453.05	1.000	453.05	Billable
2/10/2016 188458	Joy \$Expenses Expense re Magna Legal Service; Invoice 249505; Certified copy of transcript; deposition of Gilbert Saucillo on February 10, 2016	655.70	1.000	655.70	Billable
2/11/2016 184694	Joy \$FedEx Federal Express charges to Gilbert Saucillo, Upland, CA	29.64	1.000	29.64	Billable
2/16/2016 185310	Joy \$Depositions Deposition Costs re Magna Legal Services; Invoice 249505; Certified transcript; deposition of Mr. Saucillo on February 10, 2016	1525.54	1.000	1,525.54	Billable
2/18/2016 184907	Joy \$FedEx Federal Express charges to Gilbert Saucillo, Upland, CA	31.24	1.000	31.24	Billable
2/25/2016 185074	Joy \$Depositions Deposition Costs re Magna Legal Services; Invoice 251480; Videography services; deposition of Gilbert Saucillo on February 10, 2016	410.00	1.000	410.00	Billable
3/31/2016 185320	Joy \$Photocopies March copy charges; front copier; 2696 copies @ .10 per copy	0.10	2696.000	269.60	Billable
3/31/2016 185345	Joy \$Photocopies March copy charges; back copier; 309 copies @ .10 per copy	0.10	309.000	30.90	Billable
4/8/2016 185964	Joy \$Expenses Expense re ABC Legal; Invoice 1408988.100; Court filing fee	231.45	1.000	231.45	Billable
4/12/2016 185965	Joy \$Expenses Expense re ABC Legal; Invoice 1415863.100; court filing fee	29.95	1.000	29.95	Billable
4/22/2016 185969	Joy \$Expenses Expense re ABC Legal; Invoice 1436901.100; court filing fee	123.95	1.000	123.95	Billable

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Date ID	Attorney Expense	Price Markup %	Quantity	Amount	Total
4/26/2016 186794	Joy \$Hotel Hotel expenses re Homewood Suites; Agoura Hills, Swift hearing; C. Humphrey	356.42	1.000	356.42	Billable
4/26/2016 187018	Joy \$Hotel Hotel expenses re Homewood Suites, hearing on class certification; L. Joyner	356.42	1.000	356.42	Billable
4/30/2016 186040	Joy \$Photocopies April copy charges; 41 copies @ .10 per copy	0.10	41.000	4.10	Billable
4/30/2016 186053	Joy \$Photocopies April copy charges; front copier; 1558 copies @ .10 per copy	0.10	1558.000	155.80	Billable
5/2/2016 186602	Joy \$Expenses Expense re Phyllis Preston, transcript of 4/25/16 hearing	145.50	1.000	145.50	Billable
10/12/2018 193058	Joy \$Expenses Expense re Batza & Associates; Invoice 18696; expert services; investigative services attempting to locate plaintiff Burnell	748.90	1.000	748.90	Billable
5/15/2019 194326	Joy \$Expenses Expense re ABC Legal; Invoice 5225696.100; filing fees	67.50	1.000	67.50	Billable
TOTAL	Billable Costs				\$54,632.62
				Amount	Total
Total Fees: Client Hold applied					\$0.00
Total of Costs (Expense Charges)					\$54,632.62
Total new charges					\$54,632.62
New Balance Current				\$54,632.62	
Total New Balance					\$54,632.62